
Subject: Thank you for contacting the Office of the Attorney General
From: OAG <OAG@oag.state.md.us>
To: "ryan@mxt3.com" <ryan@mxt3.com>
Date Sent: Wednesday, October 9, 2024 7:27:21 AM GMT-04:00
Date Received: Wednesday, October 9, 2024 7:27:24 AM GMT-04:00

Thank you for taking the time to contact the Maryland Office of the Attorney General.

If you need assistance with consumer or health billing issues, you can look here:
<https://www.marylandattorneygeneral.gov/Pages/CPD/default.aspx>

For answers to frequently asked questions about our Office and the role of the Attorney General, you can look here: <https://www.marylandattorneygeneral.gov/Pages/FAQ.aspx>

Your submission will be reviewed and someone from our office will be in touch if more information is needed.

Sincerely,
Office of the Attorney General

<<<<COPY OF YOUR SUBMISSION>>

Category:

First Name: Ryan Dillon-Capps
Last Name: ryan@mxt3.com
Address 1: 1334 Maple Ave
Address 2:
City: Essex
State: Maryland (MD)
Zip: 21221
Email: ryan@mxt3.com
Phone Number: 7033031113

Previously Contacted the OAG? Yes

Message:

Ryan Wagner Attachments 7:16AM (5 minutes ago) to civilrights, anthony.brown, oag, Carolyn.Quattrocki, Zenita.Wickham-Hurley, Candace.McLaren-Lanham, doris.lange, Patrick.Sheridan Case Number: C-03-CV-24-002264 Case pending in preliminary stage. Last ruling September 17, 2024. Oldest pending: August 20, 2024 Miles & Stockbridge is Plaintiff's law firm - 3 Principles are directly involved. Aided Plaintiff in a failed attempt to commit fraud upon the court. Also violating FMLA leave and ADA 7 Baltimore County Circuit Court Judges are directly involved in a fraudulent case that was deficient on day one. TRO signed and dated for June 17, 2024. Entered stamp is June 14, 2024. Pro Se Served complaint with signed TRO and stamped on the 14th, given to process server on the 14th, served on the 17th. Defendant Loses Lawyer before entered and has mental break - PTSD now has catatonia (a life-threatening condition) TRO hearing for June 17th. No Hearing Notes. No Transcript. 35 minutes notice to invalid email address. Show Cause ordered 5 days before hearing. 2 days' notice. The law firm cited law saying 10 days. The law says 20+ days after conference-- no conference. Hearing Judge refuse hearing arguments x4 - 3 of them are a violation of Federal Priorities. The fourth one was denied after "motion for continuance because" Second Show Cause asking for incarceration. -- This is a fraudulent case and the second of the Plaintiff's expert's affidavit says they had access and admins the entire time --- the claims they made were false. 2nd Plaintiff's Expert says they committed Estoppel and the Plaintiff's claims are false. Law firms withdraw show cause after they are Expert shows they already had access. Premature request for default order. Signed the same day with no testimony. and so much more... to cover up other unlawful and unethical conduct. that covers up more. This is a coverup conspiracy multiple layers deep and in 7 days I will have been

trying to stop this madness and every time one group realized what I am saying is true. They join the madness fearing the consequences. Please end this. I apologize for the directness of this message, but I cannot remain silent any longer. My life is at risk due to a dangerous and life-altering situation brought on by the actions of a co-conspirator. I am on the brink of financial ruin, my reputation has been irreparably damaged, and I feel trapped by this case. I urgently need relief. I need an immediate email and text response. I need to be freed from a case I have effectively won many times over, yet now find myself litigating against the actions and inaction of an entire circuit court bench. Please have the office of Anthony Brown contact me at once—I need an urgent meeting to discuss a resolution. If I default on even a single payment, I am prepared to take every measure necessary to make my voice heard. I will fight against this injustice, judicial overreach, and become a public advocate for due process and ex parte rights. I have experienced homelessness as a child, and I refuse to put my family wife, elderly and disabled mother, or my disabled bother through that now. I apologize for the intensity of this message, but I hope it conveys the urgency of my situation. I never asked for this, and I have done nothing wrong—this has been proven beyond any reasonable doubt. The conspiracy I face has drawn in an entire bench, and I need this to end now, before it escalates further.

Subject: URGENT - Not Hyperbole or a Joke -- Baltimore County Circuit Court - 7 Judges Compromised - 15 Judges dereliction of duty -- 50+ days on oldest filing with no action
From: Ryan Wagner <ryan@mxt3.com>
To: civilrights@oag.state.md.us,anthony.brown@oag.state.md.us,oag@oag.state.md.us,Carolyn.Quattrocki@oag.state.md.us,Zenita.Wickham-Hurley@oag.state.md.us,Candace.McLaren-Lanham@oag.state.md.us,doris.lange@oag.state.md.us,Patrick.Sheridan@oag.state.md.us
Date Sent: Wednesday, October 9, 2024 7:16:46 AM GMT-04:00
Date Received: Wednesday, October 9, 2024 7:16:46 AM GMT-04:00
Attachments: motion-compel.pdf

Case Number: C-03-CV-24-002264

1. Case pending in preliminary stage.
2. Last ruling September 17, 2024.
3. Oldest pending: August 20, 2024
4. Miles & Stockbridge is Plaintiff's law firm - 3 Principles are directly involved. Aided Plaintiff in a failed attempt to commit fraud upon the court. Also violating FMLA leave and ADA
5. 7 Baltimore County Circuit Court Judges are directly involved in a fraudulent case that was deficient on day one.
6. TRO signed and dated for June 17, 2024. Entered stamp is June 14, 2024.
7. Pro Se Served complaint with signed TRO and stamped on the 14th, given to process server on the 14th, served on the 17th.
8. Defendant Loses Lawyer before entered and has mental break - PTSD now has catatonia (a life-threatening condition)
9. TRO hearing for June 17th. No Hearing Notes. No Transcript. 35 minutes notice to invalid email address.
10. Show Cause ordered 5 days before hearing. 2 days' notice. The law firm cited law saying 10 days. The law says 20+ days after conference-- no conference.
11. Hearing Judge refuse hearing arguments x4 - 3 of them are a violation of Federal Priorities. The fourth one was denied after "motion for continuance because"
12. Second Show Cause asking for incarceration. -- This is a fraudulent case and the second of the Plaintiff's expert's affidavit says they had access and admins the entire time --- the claims they made were false.
13. 2nd Plaintiff's Expert says they committed Estoppel and the Plaintiff's claims are false.
14. Law firms withdraw show cause after they are Expert shows they already had access.
15. Premature request for default order. Signed the same day with no testimony.
16. and so much more... to cover up other unlawful and unethical conduct. that covers up more. This is a coverup conspiracy multiple layers deep and in 7 days I will have been trying to stop this madness and every time one group realized what I am saying is true. They join the madness fearing the consequences. Please end this.

I apologize for the directness of this message, but I cannot remain silent any longer. My life is at risk due to a dangerous and life-altering situation brought on by the actions of a co-conspirator. I am on the brink of financial ruin, my reputation has been irreparably damaged, and I feel trapped by this case. I urgently need relief.

I need an immediate email and text response. I need to be freed from a case I have effectively won many times over, yet now find myself litigating against the actions and inaction of an entire circuit court bench. Please have the office of Anthony Brown contact me at once—I need an urgent meeting to discuss a resolution.

If I default on even a single payment, I am prepared to take every measure necessary to make my voice heard. I will fight against this injustice, judicial overreach, and become a public advocate for due process and ex parte rights. I have experienced homelessness as a child, and I refuse to put my family wife, elderly and disabled mother, or my disabled bother through that now.

I apologize for the intensity of this message, but I hope it conveys the urgency of my situation. I never asked for this, and I have done nothing wrong—this has been proven beyond any reasonable doubt. The conspiracy I face has drawn in an entire bench, and I need this to end now, before it escalates further.

Name	Court Number	Defendant Denied 100%
		Average Ruling: over 3 weeks Plaintiff Granted 100%
		Average Ruling: less 2 days
		Evidence Supports: Defendant 100%
		Valid Claim for Relief: Defendant

		<p>Defendants Claim: Beyond A Reasonable Doubt</p> <p>Plaintiff Evidence: Insufficiently filed lawsuit lacking particularized harm, link to defendant, without explaining contract relevance is supported by--</p> <ol style="list-style-type: none"> 1) Perjured statements 2) Incomplete contract 3) Experts affirm the claims are false 4) Plaintiff affirms lawsuit is retaliation 4) Plaintiff affirms admits having violated FMLA and ADA.
Dennis M. Robinson Jr.	410-887-2250	dereliction of duty ongoing abstention
Michael J. Finifter	410-887-2642	dereliction of duty ongoing abstention
Vicki Ballou-Watts	410-887-2690	dereliction of duty ongoing abstention
Robert E. Cahill, Jr.	410-887-2674	dereliction of duty ongoing abstention
Judith C. Ensor	410-887-2668	dereliction of duty ongoing abstention
Sherrie R. Bailey	410-887-2630	dereliction of duty ongoing abstention
John J. Nagle III	410-887-4307	dereliction of duty ongoing abstention
Jan Marshall Alexander	410-887-4849	Extension 7-8 dereliction of duty ongoing abstention
Nancy M. Purpura	410-887-2693	dereliction of duty ongoing abstention
Justin J. King	410-887-6531	dereliction of duty ongoing abstention
Julie L. Glass	410-887-3290	dereliction of duty ongoing abstention
Paul J. Hanley	410-887-4878	dereliction of duty ongoing abstention
Colleen A. Cavanaugh	410-887-6507	dereliction of duty ongoing abstention
Keith R. Truffer	410-887-6515	Correspondence June 21 Show Cause 6-21

		Reconsdier Continuance 7-5 dereliction of duty ongoing abstention
Andrew M. Battista	410-887-6504	Request for Default (premature) dereliction of duty ongoing abstention
Stacy A. Mayer	410-887-6510	Motion to Vacate SC Order 6-21 (MOOT-preliminary stage) dereliction of duty ongoing abstention
Wendy S. Epstein	410-887-3650	dereliction of duty ongoing abstention
Garret P. Glennon	410-887-1810	dereliction of duty ongoing abstention
Michael S. Barranco	410-887-2500	Show Cause Hearing 6-26 & 27 Civil Contempt 6-27 Preliminary Injunction Hearing 6-26 & 27 Preliminary Injunction 6-27 Dismiss FMLA Priority 6-26 Dismiss ADA Priority 6-26 Dismiss FTC Priority 6-26 Continuance 6-27 Show Cause Incarceration 7-8 Strike Show Cause 7-24 Cancelled Hearing SC#2 8-7 (day/time of) dereliction of duty ongoing abstention
Marc A. DeSimone, Jr.	410-887-6840	TRO Hearing 6-17 (sign order entered stamp 6-14) dereliction of duty ongoing abstention
James L. Rhodes	410-887-1060	dereliction of duty ongoing abstention
Patricia M. DeMaio	410-887-1416	dereliction of duty ongoing abstention
H. Patrick Stringer	Sen. Judge	Strike URL Referenced Evidence 7-30 Strike Exhibit 1B 7-30 (normally valid) Amended URL Strike 8-8

		Motion to Amend 8-8
		Dismiss 9-17
		dereliction of duty
		ongoing abstention

Subject: Re: Third Request for Administrative Hearing - Clerk Preventing Submission for Hearing About the Clerk
From: Ryan Wagner <ryan@mxt3.com>
To: Daniel Andrews -OAH- <daniel.andrews@maryland.gov>
Date Sent: Friday, October 11, 2024 9:08:33 AM GMT-04:00
Date Received: Friday, October 11, 2024 9:08:33 AM GMT-04:00
Attachments: [third-request-admin-hearing.pdf](#), [BCCC Due Process Issues.pdf](#)

Good Morning Your Honor,

Attached is the **Third Request for an Administrative Judge Hearing** that was filed with the Civil Clerk in **Case No. C-03-CV-24-002264**. I have uncovered additional instances of mishandling overnight, which I am prepared to present during the hearing, along with any further issues that may arise before then. For your reference, I am also attaching my raw notes with supporting screenshots.

This case, from its initial filing to the present, has been plagued by significant issues involving opposing counsel, seven judges, and the Clerk's Office. If it were not on the public record, the extent of these problems would seem unbelievable, and yet I continue to uncover new concerns.

I appreciate your time and consideration and look forward to the opportunity to address these matters.

Sincerely,
Ryan Dillon-Capps

ryan@mxt3.com
703-303-1113 (text)

On Fri, Oct 11, 2024 at 8:17 AM Daniel Andrews -OAH- <daniel.andrews@maryland.gov> wrote:

What is this about ?
Plz send ROA?

Dan Andrews

On Oct 11, 2024, at 4:09 AM, Ryan Wagner <ryan@mxt3.com> wrote:

Dear Honorable Administrative Judges,

I hope this message finds you well. I wanted to apologize for any oversight in contacting the Chief Judge directly yesterday regarding my request for a hearing. In hindsight, it may not have been the appropriate first step, and I sincerely apologize for any confusion or procedural misstep.

After locating your contact information, I wanted to reach out to correct any potential mistake and request your assistance in reviewing the attached materials, which were filed yesterday. I am seeking help to arrange a hearing at the earliest opportunity due to several ongoing administrative issues affecting case C-03-CV-24-002264.

I appreciate any support you can provide in addressing these concerns, particularly those within your purview. I regret the need to email you directly, but given the unique circumstances and procedural difficulties I've encountered, I felt it necessary to seek your assistance.

Thank you for your understanding, time, and consideration. I look forward to your response and guidance.

Many apologies for this email,
Ryan Dillon-Capps
703-303-1113 (text)
ryan@mxt3.com

----- Forwarded message -----

From: **Ryan Wagner** <ryan@mxt3.com>

Date: Thu, Oct 10, 2024 at 10:19 AM

Subject: Third Request for Administrative Hearing - Clerk Preventing Submission for Hearing About the Clerk

To: <chung.pak@maryland.gov>

Dear Honorable Administrative Judge,

I hope this email finds you well. Please see the attached **Third Request for Administrative Hearing**. Normally, I would not bypass the Clerk's Office for such a request; however, I believe the Clerk is intentionally acting to prevent the hearing from taking place. This is necessary to discuss ongoing concerns regarding their application of policies and rules, which I believe have resulted in the improper handling of my filings.

Given the procedural obstacles I've encountered, I respectfully request that you review this matter and schedule a hearing at your earliest convenience to ensure fair access to the judicial process.

Thank you for your time and consideration. I look forward to your response. I am submitting this to the clerks and attached the submission, and emailing it directly to you to prevent further delay.

Many apologies for this email,
Ryan Dillon-Capps
703-303-1113
ryan@mxt3.com
<third-request-admin-hearing.pdf>
<18344663-20241010-1012-third request-admin-hearing.pdf>

CONFIDENTIALITY NOTICE: This e-mail may contain confidential or privileged information. If you have received this e-mail in error, please notify the sender immediately by return e-mail, delete this e-mail and destroy any copies.

Subject: Re: Third Request for Administrative Hearing - Clerk Preventing Submission for Hearing About the Clerk
From: Chung Pak -OAH- <chung.pak@maryland.gov>
To: ryan@mxt3.com
Date Sent: Friday, October 11, 2024 10:44:30 AM GMT-04:00
Date Received: Friday, October 11, 2024 10:44:41 AM GMT-04:00

Good Morning Mr. Dillion-Capps,

I am in receipt of your email. I am the Chief Administrative Law Judge of the Office of Administrative Hearings (OAH), which is not part of the Circuit Court for Baltimore County. Please be advised that neither I nor the Administrative Law Judges of the OAH have authority to take action with respect to any proceeding you have pending in the Circuit Court for Baltimore County, and I have no authority over the Clerk's Office of the Circuit Court for Baltimore County. The Administrative Judge for the Circuit Court of Baltimore County is the Honorable Dennis M. Robinson. You may want to redirect your email to that Court.

Regards,

Chung K. Pak
Chief Administrative Law Judge
Maryland Office of Administrative Hearings

On Thu, Oct 10, 2024 at 10:19AM Ryan Wagner <ryan@mxt3.com> wrote:

Dear Honorable Administrative Judge,

I hope this email finds you well. Please see the attached **Third Request for Administrative Hearing**. Normally, I would not bypass the Clerk's Office for such a request; however, I believe the Clerk is intentionally acting to prevent the hearing from taking place. This is necessary to discuss ongoing concerns regarding their application of policies and rules, which I believe have resulted in the improper handling of my filings.

Given the procedural obstacles I've encountered, I respectfully request that you review this matter and schedule a hearing at your earliest convenience to ensure fair access to the judicial process.

Thank you for your time and consideration. I look forward to your response. I am submitting this to the clerks and attached the submission, and emailing it directly to you to prevent further delay.

Many apologies for this email,
Ryan Dillon-Capps
703-303-1113
ryan@mxt3.com

--

Chung K. Pak
Chief Administrative Law Judge
Office of Administrative Hearings
11101 Gilroy Road

Subject: RE: Third Request for Administrative Hearing - Clerk Preventing Submission for Hearing About the Clerk
From: Administrative Hearings <administrativehearings@baltimorecountymd.gov>
To: "ryan@mxt3.com" <ryan@mxt3.com>, Administrative Hearings <administrativehearings@baltimorecountymd.gov>
Date Sent: Thursday, October 10, 2024 10:14:21 AM GMT-04:00
Date Received: Thursday, October 10, 2024 10:14:26 AM GMT-04:00

Good Morning,

We do not hear these cases. You will need to reach out to the Circuit Court for Baltimore County or the State of Maryland Office of Administrative Hearings.

Our office handles, Zoning and Development Hearings. Thank you.

Have a good day.

Office of Administrative Hearings for Baltimore County
Jefferson Building
105 West Chesapeake Avenue, Suite 103
Towson, MD 21204
410-887-3868 - press 0
administrativehearings@baltimorecountymd.gov

From: Ryan Wagner <ryan@mxt3.com>
Sent: Thursday, October 10, 2024 10:11 AM
To: Administrative Hearings <administrativehearings@baltimorecountymd.gov>
Subject: Third Request for Administrative Hearing - Clerk Preventing Submission for Hearing About the Clerk

CAUTION: This message from ryan@mxt3.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments. Do not click on any link and fill any request asking for your username and password at any time. BCG OIT will never ask for your username and password over email. Use the "Phish Alert Report" button to report.

Dear Honorable Administrative Judges,

I hope this email finds you well. Please see the attached **Third Request for Administrative Hearing**. Normally, I would not bypass the Clerk's Office for such a request; however, I believe the Clerk is intentionally acting to prevent the hearing from taking place. This is necessary to discuss ongoing concerns regarding their application of policies and rules, which I believe have resulted in the improper handling of my filings.

Given the procedural obstacles I've encountered, I respectfully request that you review this matter and schedule a hearing at your earliest convenience to ensure fair access to the judicial process.

Thank you for your time and consideration. I look forward to your response.

Many apologies for this email,
Ryan Dillon-Capps
703-303-1113
ryan@mxt3.com

CONNECT WITH BALTIMORE COUNTY



Subject: Your incident INC0820376 has been resolved
From: Judicial Information Systems <mdcourts@service-now.com>
To: ryan@mxt3.com
Date Sent: Wednesday, October 30, 2024 11:31:44 AM GMT-04:00
Date Received: Wednesday, October 30, 2024 11:31:45 AM GMT-04:00

INC0820376 - Fwd: SECOND ATTEMPT: FW: [EXTERNAL] Ruling Opinions for C-03-CV-24- 002264

Your incident has been resolved.

The incident will automatically close in 72.0 hours

Summary details

Resolved notes: Caller confirmed he can view all documents in the case file. Caller feels there are documents in the case file that aren't there, including opinions. Caller feels opposing counsel may have access to additional documents, but I explained that he and opposing counsel have the same level of access. Referred Caller to clerk's office.

If you feel the issue is not resolved, please send an email to [JIS Customer Services](#).

Thank you.

[Unsubscribe](#) | [Notification Preferences](#)

Ref:MSG10152218

Subject: Re: Your incident INC0820376 has been resolved
From: Ryan Wagner <ryan@mxt3.com>
To: Judicial Information Systems <mdcourts@service-now.com>
Date Sent: Wednesday, October 30, 2024 11:42:16 AM GMT-04:00
Date Received: Wednesday, October 30, 2024 11:42:16 AM GMT-04:00

Geno Frazier became an active participant when they used the ticketing system and applied the shared language of the conspirators

for documentation purposes

Caller, Dillon-Capps, states as follows:

- 1) If what I see is the entire court record then things I have filed are missing from the court record.
- 2) If what I see is the entire court record then things I have obtained from the process server on what was served to me is different than what is on the court record
- 3) if what I see is the entire court record then hearing notes, transcripts, that should be part of the court record are missing
- 4) if what I see is the entire court record then the the release of exhibits on July 25, 2024 is missing the item that was released because my view only has a record of it occurring not what it is

these are a few items that are discrepancies in what I know is incorrect, and if the stuff I am providing to the court is not being admitted to the court record then I don't know why I am filing things in the nether. No wonder the record reflects as it does. all of the evidence, transcripts, hearing notes, ruling opinions, original documents, and more are all missing from the record.

The Plaintiff is withdrawing and I have won -- yet the end result is a win for them because they already did the harm and this whole time the evidence hasn't been part of the court record.

On Wed, Oct 30, 2024 at 11:31 AM Judicial Information Systems <mdcourts@service-now.com> wrote:

INC0820376 - Fwd: SECOND ATTEMPT: FW: [EXTERNAL] Ruling Opinions for C-03-CV-24-002264

Your incident has been resolved.

The incident will automatically close in 72.0 hours

Summary details

Resolved notes: Caller confirmed he can view all documents in the case file. Caller feels there are documents in the case file that aren't there, including opinions. Caller feels opposing counsel may have access to additional documents, but I explained that he and opposing counsel have the same level of access. Referred Caller to clerk's office.

Geno Frazier became an active participant when they used the ticketing system and applied the shared language of the conspirators. At no point was there any confusion about the opposite was being said.

If you feel the issue is not resolved, please send an email to [JIS Customer Services](#).

Thank you.

Subject: RE: [EXTERNAL] Re: June 27, 2024 Contempt Hearing Notice - Ohana Growth Partners, LLC v. Ryan Dillon-Capps, C-03-CV-24-2264
From: BaltCo Digital Recording <baltcodigrec@mdcourts.gov>
To: "ryan@mxt3.com" <ryan@mxt3.com>
Date Sent: Thursday, June 27, 2024 7:33:19 AM GMT-04:00
Date Received: Thursday, June 27, 2024 7:33:23 AM GMT-04:00

Good Morning Mr. Wagner.

Digital Recording can provide a copy of the transcript for you.
You can make your online request at www.baltimorecountymd.gov/transcripts

Once our office receives your request we will assign it to a transcriber. They will provide the estimate and delivery guidelines.

The other option you have to is to request an audio link. A link can emailed directly to you, normally within 24 hours.
You can use the same website to order your audio link.

The cost of an audio link is \$25.00. We will send you the information on how to pay for the link once we receive an official request from you.

The cost of a transcript can vary. Your trial was 79 minutes long, a very rough starting estimate would be around \$300.00. The transcriber would give you a final estimate before she begins typing your transcript. The transcriber may also ask for a deposit to begin preparing your transcript.

If you have any question, please feel free to email us.

Sharon L. Elligson

Digital Recording Office
The Circuit Court of Baltimore County
401 Bosley Avenue
Room 403
Towson, Maryland 21204
410-887-4873

From: Rachel Kiefer <rachel.kiefer@mdcourts.gov>
Sent: Wednesday, June 26, 2024 3:09 PM
To: BaltCo Digital Recording <baltcodigrec@mdcourts.gov>
Cc: Fallyn Allman <Fallyn.Allman@mdcourts.gov>
Subject: FW: [EXTERNAL] Re: June 27, 2024 Contempt Hearing Notice - Ohana Growth Partners, LLC v. Ryan Dillon-Capps, C-03-CV-24-2264

Good afternoon,

Will you kindly respond to the below email?

Thank you!

Rachel Kiefer



Law Clerk to the Honorable Michael S. Barranco
Circuit Court for Baltimore County
401 Bosley Avenue
Towson, MD 21204
410-887-2500 (Office)
410-296-1324 (Fax)
rachel.kiefer@mdcourts.gov

From: Ryan Wagner <ryan@mxt3.com>
Sent: Wednesday, June 26, 2024 3:08 PM
To: Fallyn Allman <Fallyn.Allman@mdcourts.gov>
Cc: rbrennen@milesstockbridge.com; Rachel Kiefer <rachel.kiefer@mdcourts.gov>
Subject: [EXTERNAL] Re: June 27, 2024 Contempt Hearing Notice - Ohana Growth Partners, LLC v. Ryan Dillon-Capps, C-03-CV-24-2264

Dear Rachel Kiefer,

ADA Accomodation

I am writing to request a transcript of the June 26, 2024, hearing in Ohana Growth Partners, LLC v Ryan Dillon-Capps, Case No. C-03-CV-24-002264. Judge Michael S. Barranco presided over this hearing. I understand that we left there only a few hours ago, but I struggle to remember everything said. I think I tried to explain this in court, but my ability to advocate for myself is limited in high-conflict "live" interactions. It would be of tremendous help if I get a copy of the transcript so I have something to reference regarding what was said. I will gladly pay the fee, but I don't have an attorney because mine went on bereavement and then had a prescheduled conference, so they returned all the money paid. I know how hard it is to lose a family member, but it has left me without representation. I found out this week that the letter I wrote last week to request the opportunity to obtain counsel was denied. Leaving me unsure as to the proper procedure for obtaining the transcript. I am really sorry to burden you, but this was the first hearing that I had advanced notice of, and even while I write this email, I feel like I can recall less and less of what happened. Any assistance on how to obtain the transcript would be very helpful.

With gratitude and appreciation,
Ryan Dillon-Capps
1334 Maple Ave
Essex MD 21221
ryan@mxt3.com
703-303-1113
I strongly prefer text or email

On Wed, Jun 26, 2024 at 11:15 AM Fallyn Allman <Fallyn.Allman@mdcourts.gov> wrote:

Dear All:

Attached please find a copy of the hearing notice in the above captioned matter. This is scheduled for a Contempt Hearing tomorrow, June 27th, 2024 at 1:00 p.m. before Judge Barranco in Courtroom 8. Please let us know who, if any, parties are requesting to attend this hearing remotely so our chambers can send out the zoom invitation for this hearing.

This email is for scheduling purposes only.

Thank you,

Fallyn L. Allman,

Subject: Re: [EXTERNAL] Re: Your Incident INC0820376 has comments added
From: Ryan Wagner <ryan@mxt3.com>
To: Eleanor Fisher <eleanor.fisher@mdcourts.gov>
Date Sent: Wednesday, October 30, 2024 3:41:58 PM GMT-04:00
Date Received: Wednesday, October 30, 2024 3:41:58 PM GMT-04:00

That is not realistic. I manage my agoraphobia fairly well, but going into the courthouse everyday and trying to work from there will be more than I can manage on a regular basis.

I have already won the lawsuit, pending a few loose ends to prevent further abuse of process.

What I need is access to the court record, all of it remotely. Are you saying remote access is an unreasonable burden for the courthouse? I don't understand why I can't have access? It seems like a reasonable request?

I can't even see everything I have submitted, or a large portion of things I have filed are not on the court record. My concern is that Judges are adjudicating without the supporting evidence, and the ruling record reflects that as a possibility. Not many ways to explain the ruling record in a lawsuit where the plaintiff has no factual and truthful basis for any of their material statements or claims.

Do I have an option 2 that is't going to cost me anything or require me to be physically at the courthouse all day every day. Normally I would just pay the cost, but five months of the fraudulent lawsuit has resulted in me going into financial default and I don't have it.

Respectfully,
RDC

There is no reason that something should be available only in person

On Wed, Oct 30, 2024 at 2:49 PM Eleanor Fisher <eleanor.fisher@mdcourts.gov> wrote:

Good afternoon Ryan,

Hope you're well. I've spoken with my supervisor regarding your situation, and he recommends coming in person to the Law Library in the Circuit Court. There are free legal resources including paralegals and computers you can use to verify your case documents.

Thank you,

Eleanor Fisher

Senior Records Assistant

Judicial Records

Baltimore County Circuit Court

Clerk's Office

401 Bosley Ave.

Towson, MD 21204

410-887-3494

eleanor.fisher@mdcourts.gov

she/her

From: Ryan Wagner <ryan@mxt3.com>

Sent: Wednesday, October 30, 2024 11:31 AM

To: Eleanor Fisher <eleanor.fisher@mdcourts.gov>

Subject: [EXTERNAL] Re: Your Incident INC0820376 has comments added

Good Morning Eleanor Fisher,

I have a bit of a quandry.

Geno Frazier is telling me that I have everything in the court record to view. However, if that is true then I don't know where all of the things I am uploading is going, and why isn't there records of ruling opinions, no hearing notes from June 17th, why do I have copies of things that I got from a 3rd party that are different than the version in the court record?

Any ideas on how to address these issues because Geno Frazier telling me that I can see the entire court record is akin to telling me that the court record is incorrect in many ways.

thoughts on a solution?

On Tue, Oct 29, 2024 at 9:37 AM Judicial Information Systems <mdcourts@service-now.com> wrote:

INC0820376 - Fwd: SECOND ATTEMPT: FW:
[EXTERNAL] Ruling Opinions for C-03-CV-24-
002264

Comments:

2024-10-29 09:36:34 AM EDT - Geno Frazier (eugene.frazier) Additional Comments

Ryan,

I'm with the Maryland Judiciary. I can't find a phone number for you. Please call me at 443-709-8320 so we can make sure you have the access you're entitled to with this case.

Geno Frazier
JIS Application Support.

2024-10-28 12:34:23 PM EDT - Ryan Wagner (RyanWagner) Additional Comments

forwarded by: ryan@mxt3.com

Please see my previous email.

Any idea what the issue is? what would it take to have equal access?

----- Forwarded message -----

From: Ryan Wagner <ryan@mxt3.com>

Date: Mon, Oct 28, 2024, 12:31 PM

Subject: Re: SECOND ATTEMPT: FW: [EXTERNAL] Ruling Opinions for
C-03-CV-24-002264

To: Eleanor Fisher <eleanor.fisher@mdcourts.gov>

That is not the true at all. I would be happy to send you the index,screenshots, or share a teams call to show you what I see. However, I am missing items.

I have no ruling opinions.

I have no hearing sheet or transcript for june 17th.

I can not see most of the exhibits I have submitted.

There is a mention of an exhibit being released but I dont see it or know what it is or was.

Some of the records are misleading, like the proposed order for the TRO is the signed pre entered, so it looks like the TRO was signed prematurely.

Those are a few examples. If I am supposed to have the same record as the Plaintiff-- I do not

I have won the case on guess work, but if I could get equal access. That would be fantastic and much appreciated.

RDC

On Mon, Oct 28, 2024, 12:05 PM Eleanor Fisher <eleanor.fisher@mdcourts.gov> wrote:

> Good morning Ryan,

>

>

>

> Thank you for your response. If you would like every order so far in case

> no. C-03-CV-24-002264, I have attached an invoice to that end. The total

> would be \$164.00 for 328 pages, and I would be able to email the documents

> to you after payment.

>
>
>
>
> However, after speaking with my leadership, it appears you are a
> registered e-Filer with full case access via MDEC. You should already be
> able to log into your MDEC portal and view the complete case, including
> every order, the same as the opposing party can. If you are having trouble
> with your MDEC access, you may want to reach out to Judicial Information
> Systems which manages the program. Their email is mdcourts@service-now.com
> and their phone number is 410-260-1114.
>
>
>
> Please let me know how you would like to proceed.
>
>
>
> Thank you,
>
>
>
>
>
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> *Eleanor Fisher*
>
> Senior Records Assistant
>
> Judicial Records
>
> Baltimore County Circuit Court
>
> Clerk's Office
>
> 401 Bosley Ave.
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> Towson, MD 21204
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> 410-887-3494
>
> eleanor.fisher@mdcourts.gov
>
> *she/her*
>
>
>
> *From:* Ryan Wagner <ryan@mxt3.com>
> *Sent:* Monday, October 28, 2024 10:43 AM

> *To:* Eleanor Fisher <eleanor.fisher@mdcourts.gov>
> *Cc:* CC - Baltimore County Clerk Records Leads <
> ccbaltcoclerkrecordsleads@mdcourts.gov>
> *Subject:* Re: SECOND ATTEMPT: FW: [EXTERNAL] Ruling Opinions for
> C-03-CV-24-002264
>
>
>
> Thank you for following up - the answer is all of them. You have no idea
> how limiting it is to have no idea why things are ruled the way they are.
> Particularly in this case.
>
> I need them digitally, is that possible? Is there a way for me to get
> equal access to the same records as the opposing party does?
>
> Thank you,
>
> RDC
>
>
>
> On Mon, Oct 28, 2024 at 10:36AM Eleanor Fisher <
> eleanor.fisher@mdcourts.gov> wrote:
>
> Good morning Ryan,
>
>
>
> Hope you're well. This is my second attempt to reach you regarding this
> request.
>
>
>
> As I mentioned last week, your case is quite large and to date there are
> 27 signed orders in it. The case is still open and ongoing, so there are no
> final opinions at this time. If you could clarify which orders you are
> requesting, it would be appreciated. You can use Maryland Judiciary Case
> Search <<https://casesearch.courts.state.md.us/casesearch/>> to identify
> the case events you need documents from. I would be happy to provide you
> with whatever documents you specify at \$0.50 per page.
>
>
>
> Alternatively, you are welcome to come in person to the Circuit Court and
> view your complete case documents on our kiosks or in the Law Library and
> print your documents that way.
>
>
>
> Thank you,
>
>
>
>

>
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> *Eleanor Fisher*
>
> Senior Records Assistant
>
> Judicial Records
>
> Baltimore County Circuit Court
>
> Clerk's Office
>
> 401 Bosley Ave.
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> Towson, MD 21204
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> 410-887-3494
>
> eleanor.fisher@mdcourts.gov
>
> *she/her*
>
>
>
> *From:* Eleanor Fisher
> *Sent:* Thursday, October 24, 2024 2:24 PM
> *To:* Ryan Wagner <ryan@mxt3.com>
> *Cc:* CC - Baltimore County Clerk Records Leads <
> ccbaltcoclerkrecordsleads@mdcourts.gov>
> *Subject:* FOLLOW UP: FW: [EXTERNAL] Ruling Opinions for C-03-CV-24-002264
>
>
>
> Good afternoon Ryan,
>
>
>
> Hope you're well. I have located your case and have some follow up
> questions.
>
>
>
> As your case is quite large, there are a number of orders that could be
> provided to you. Can you clarify what dates or events in your case you're
> requesting orders from? You can use Maryland Judiciary Case Search
> <<https://casesearch.courts.state.md.us/casesearch/>> to identify the case
> events you need documents from. I would be happy to provide you with
> whatever documents you specify at \$0.50 per page.

>
>
>
>
> Alternatively, you are welcome to come in person to the Circuit Court and
> view your complete case documents on our kiosks or in the Law Library and
> print your documents that way.
>
>
>
> Thank you,
>
>
>
>
>
>
> *Eleanor Fisher*
>
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> Senior Records Assistant
>
> Judicial Records
>
> Baltimore County Circuit Court
>
> Clerk's Office
>
> 401 Bosley Ave.
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> Towson, MD 21204
> <<https://www.google.com/maps/search/401+Bosley+Ave.+%0D%0A+Towson,+MD+21204?entry=gmail&source=g>>
>
> 410-887-3494
>
> eleanor.fisher@mdcourts.gov
>
> *she/her*
>
>
>
>
> *From:* Ryan Wagner <ryan@mxt3.com>
> *Sent:* Wednesday, October 23, 2024 12:57 PM
> *To:* BaltCo Circuit Court <baltcocc@mdcourts.gov>
> *Subject:* [EXTERNAL] Ruling Opinions for C-03-CV-24-002264
>
>
>
> Greetings and Salutations,
>
> I hope this message finds you well. I am writing to request the ruling

> opinions for the case referenced above: *Case No. C-03-CV-24-002264*.
>
> I have been attempting to obtain these documents for some time and would
> greatly appreciate your assistance in facilitating this request. While I
> understand that your office is busy, I trust your judgment in determining
> an appropriate and reasonable timeframe for the satisfaction of this
> request.
>
> My personal impact has been significant, as I have been forced to rely on
> guesswork to determine the rulings without access to this information. I am
> currently at an impasse where my ability to proceed is limited by my access
> to the ruling opinions in this case.
>
> Please let me know if there are any fees associated with this request, and
> I will be happy to arrange payment. Thank you for your time and assistance.
> I look forward to hearing from you at your earliest convenience.
>
> With much appreciation and gratitude,
>
> RDC
>
>

You can view all the details of the incident by following the link below:

[Take me to the Incident](#)

Thank you.

[Unsubscribe](#) | [Notification Preferences](#)

Ref:MSG10142666

JUDICIAL RECORDS INVOICE

From: Baltimore County Clerk of the Circuit Court
Judicial Records
PO Box 6754
Towson MD 21285-6754

Date: _____

Re (Case Number if applicable): _____

Case Name: _____

Documents Requested: _____

Your request is priced as follows:

PAYMENT:

_____ Cost per copy page is \$0.50 per page (_____ x \$ 0.50 = \$ _____)

_____ Cost per certification is \$5.00 (_____ x \$ 5.00 = \$ _____)

_____ Cost per Exemplification is \$10.00 (_____ x \$10.00 = \$ _____)

TOTAL DUE = \$ _____

PAYMENT OPTIONS:

Include a copy of this invoice with your mailed payment and mail to address above.

Payable to: Clerk of the Circuit Court

- Money Order
- Check that includes:
 - Your name, current address and imprinted account number
 - Not accepted: Out-of-state personal check or Two-Party check
- SAME-DAY PROCESSING:
 - We accept VISA, MasterCard, or Discover Credit Card Payment by telephone.
To pay using this option, dial 410-887-3494

ADDITIONAL INFORMATION:

_____ Your Full Name _____

_____ Your Full Address _____

_____ Your Telephone Number _____

_____ Last 4 digits ONLY of your Credit Card Number if applicable _____

PER (Employee's Initials): _____
Judicial Records (410) 887-3494

Subject: Re: FWD to Judges: DeSimone, Truffer, Barranco, Alexander, Stringer, Mayer, Battista
From: Ryan Wagner <ryan@mxt3.com>
To: mdmanual@maryland.gov
Date Sent: Monday, October 7, 2024 8:00:00 AM GMT-04:00
Date Received: Monday, October 7, 2024 8:00:00 AM GMT-04:00

Happy Monday Everyone,

First, I want to clarify that I am sending this message here in case this unprecedented situation requires additional steps before I can open formal negotiations to avoid litigation. I am taking this action both because I wish to resolve this matter, and because the law requires me to attempt negotiation before filing. If another judge or representative of the court—or the state of Maryland—wants to intervene, I welcome it. I just need someone to step up and negotiate on behalf of those they represent.

As a secondary measure, both this email and any other correspondence will be included in filings and in a way, I argue that this email address represents a buffer to establish contact and follow a procedural process that hopefully navigates the expansive and anomalous conditions. Good Faith as I will likely be stating in excess about everything.

Urgency and Context:

While my financial situation will be addressed in upcoming filings, that's not my immediate concern. I have been managing **PTSD**, and in a week, it will have been one year. During this time, I have repeatedly faced attempts to use **estoppel** against me, and this has been extremely challenging. While I understand there are likely normal reasons for delays, I am struggling mentally as my condition has worsened—specifically my symptoms of **catatonia**.

I am at a critical point mentally, and though I am doing everything in my power to stay aware and manage my symptoms, it is becoming harder every day. I urge someone from the court to please provide an update as soon as possible. The uncertainty is worsening my condition, and I fear that without clarity, I may have to escalate this situation, which I wish to avoid.

Human to human, I ask for confirmation of what has delayed action for nearly 50 days since the opposition was filed. Please reassure me that these delays are explainable, and I do not need to take more drastic steps to free myself from this dangerous situation. My restraint thus far has been an effort to reduce harm, but the situation has caused nothing but harm to anything and everything it touches. I have been the point of impact for this far too long.

Litigation Analysis: A Reflection on Judge Barranco's Meticulousness

In this context, I will provide a brief analysis of **Judge Michael Barranco's** litigation style to illustrate my preparedness for negotiation.

Judge Barranco's prior work reflects his **meticulous attention to detail** and his incredible success in the courtroom. With a career built on **commercial litigation, products liability, and banking disputes**, his **technical acumen** is second to none. His ability to quickly identify **weaknesses in a plaintiff's case** has been well-documented. I distinctly recall how, on **June 26th**, he immediately tore into the procedural weaknesses of the case, commenting on the **timing issues** within seconds of reviewing the docket. That brilliance was on full display. It is precisely this level of detail that makes him such a formidable presence in court.

However, it is his own **success and proficiency** that will be my **opening gambit**. Judge Barranco's past achievements in dismantling cases quickly and efficiently will now form the very foundation to which I give him an opportunity to demonstrate his defensive excellence. I have already mapped out dozens upon dozens of responses to each potential argument he may raise, preparing for every permutation possible. In fact, using AI technology, I am currently tracking over **512,000 different permutations** of potential choices in this litigation, allowing me to act with **foresight** to guide the case toward my intended outcome.

Inspired by the **FBI's litigation investigation strategies**, I have adopted the mindset that **the result** is the only thing that matters. Every step, motion, or defense along the way is merely part of the **strategy to get to that final point**. I believe this understanding will be critical in facing a judge of Barranco's caliber, whose past work sets the standard by which this case will be judged.

A cry help and a sincere desire to avoid conflict,
Ryan Dillon-Capps

ryan@mxt3.com

703-303-1113 (text only please)

On Sat, Oct 5, 2024 at 9:41 PM Ryan Wagner <ryan@mxt3.com> wrote:

Greetings, this email is directed to the following Judges.

Marc A DeSimone Jr.

Keith R Truffer

Michael Barranco

Jan Marshall Alexander

H Patrick Stringer

Stacey A Mayer

Andrew Battista

Notice to the Court has been provided in the Notice for Hypothesis of Crayons that before Monday at Midnight I intend to file the **Motion to Compel Joinder**. I don't want to, and I really want to resolve this one on one with each of you. This will be filed with the official complaint. I am requesting an opportunity to resolve. Please do not let the proceedings mislead you because what the context left out is that I am in this mess because I didn't want this to go to court -- not me vs them, but anyone vs Ohana.

Battista, Alexander, and DeSimone - a simple misunderstanding that in the confusion of it all happened once. I am serious, the other context left out is that I kept at it because of 1500 employees and 2 of those employees and the entire company were on the chopping block. A person lives and commits a large portion of that time to the service to the public, one mistake does not make that service less valuable.

Particularly in the case of Judge Stringer. Please tell me you did this because you know who Glenn Norris is and the hall of fame isn't that big of a place. I can respect support for that, or just help it out. The last thing I want is anything to change the career you already did and I found lots of attorneys who had great things to say about, and I think I can be one of those who argues that in the fog of war the court record is left to some notes and what time you had late at night. Why would you have any reason to pull all that other evidence why the court record shows a clear story and if this was any stage other than preliminary -- I could add the argument that the court record is fact and you ruled on the facts of the case. Minor oversight that this was still in the preliminary stage.

This is genuine, I am serious. I really do not want to add a circuit court judge on Monday. If you want me to talk to your attorney then give them my email please and I will make myself available and if there is genuine effort here I will stall the filling.

There are few lawyers who I would back down from, and this is not an expression of doubting my resolve or capacity. Even at 1/3rd, and it will get better, I have the advantage here because I can review your rulings and previous litigation. Brennen was weakest in preliminary and if pushed past, I would have turned to tort law and stopped his procedural hoopla. I am not an over zealous law and order fan, and my definicts have been because I literally had to file something and I couldn't find my hand let alone where I had last saved my work.

It is crazy to think that come Monday night, I don't have an unresolved issue with any one on this email?

Humbled and Hoping,

Ryan Dillon-Capps

ryan@mxt3.com

703-303-1113 (text only please)

Subject: RE: [EXTERNAL] Ohana Growth Partners, LLC v. Ryan Dillon-Capps - C-03-CV-24-2264
From: Lauren Prinkey <Lauren.Prinkey@mdcourts.gov>
To: Ryan Wagner <ryan@mxt3.com>
Date Sent: Friday, July 12, 2024 11:10:47 AM GMT-04:00
Date Received: Friday, July 12, 2024 11:10:51 AM GMT-04:00

Good morning,

Once again this case has not been assigned to Judge Truffer. Please contact the clerk's office if you need information.

Thank you,
Lauren

Lauren Prinkey
Judicial Assistant to the Honorable Keith R. Truffer
Circuit Court for Baltimore County
401 Bosley Avenue
Towson, MD 21204
410-887-6515 (Office)
410-296-1810 (Fax)

From: Ryan Wagner <ryan@mxt3.com>
Sent: Friday, July 12, 2024 9:53 AM
To: Lauren Prinkey <Lauren.Prinkey@mdcourts.gov>
Subject: Fw: [EXTERNAL] Ohana Growth Partners, LLC v. Ryan Dillon-Capps - C-03-CV-24-2264

[@Lauren.Prinkey@mdcourts.gov](mailto:Lauren.Prinkey@mdcourts.gov) I am sorry to bother you, but could you forward me the original email that Mr. Brennen is referring to in his email to me on the 24th. I couldn't find it and I wasn't aware you had my email address until the 24/25th.

Also, are you able to grant me access to the entire case record online? They filed the case with either no email address or an email address I don't have access to, and I have linked my correct email address to the case, but I can't see anything, and I feel like I am missing correspondence.

Respectfully,
RDC

From: Brennen, Robert S. <RBRENNEN@milesstockbridge.com>
Sent: Monday, June 24, 2024 6:58 PM
To: ryan@mxt3.com <ryan@mxt3.com>
Subject: Fwd: [EXTERNAL] Ohana Growth Partners, LLC v. Ryan Dillon-Capps - C-03-CV-24-2264

Sent from my iPhone

Begin forwarded message:

From: Lauren Prinkey <Lauren.Prinkey@mdcourts.gov>
Date: June 21, 2024 at 12:04:28 EDT
To: "Brennen, Robert S." <RBRENNEN@milesstockbridge.com>, "Frenkil, Steven D." <sfrenkil@milesstockbridge.com>, ryan@mxt3.com
Subject: [EXTERNAL] Ohana Growth Partners, LLC v. Ryan Dillon-Capps - C-03-CV-24-2264

[EXTERNAL]

Good afternoon,

Please see the attached orders from the court.

Thank you,
Lauren

Lauren Prinkey
Judicial Assistant to the Honorable Keith R. Truffer
Circuit Court for Baltimore County
401 Bosley Avenue
Towson, MD 21204
410-887-6515 (Office)
410-296-1810 (Fax)

Confidentiality Notice:
This e-mail, including any attachment(s), is intended for receipt and use by the intended addressee(s), and may contain confidential and privileged information. If you are not an intended recipient of this e-mail, you are hereby notified that any unauthorized use or distribution of this e-mail is strictly prohibited, and requested to delete this communication and its attachment(s) without making any copies thereof and to contact the sender of this e-mail immediately. Nothing contained in the body and/or header of this e-mail is intended as a signature or intended to bind the addressor or any person represented by the addressor to the terms of any agreement that may be the subject of this e-mail or its attachment(s), except where such intent is expressly indicated.

Any federal tax advice provided in this communication is not intended or written by the author to be used, and cannot be used by the recipient, for the purpose of avoiding penalties which may be imposed on the recipient by the IRS. Please contact the author if you would like to receive written advice in a format which complies with IRS rules and may be relied upon to avoid penalties.

[Secure Upload/Download files click here.](#)

Subject: Commission on Judicial Disabilities Complaint Form
From: Maryland Judiciary Commission on Judicial Disabilities <MDCourts.no-reply@mdcourts.gov>
To: complaintsJD@mdcourts.gov
Cc: ryan@mxt3.com
Date Sent: Tuesday, October 8, 2024 2:50:38 PM GMT-04:00
Date Received: Tuesday, October 8, 2024 2:50:39 PM GMT-04:00

Your submission to the Maryland Commission on Judicial Disabilities has been received. Please note this email address is not monitored and does not accept replies. Submitted form information: Form submitted on Tue, 10/08/2024 - 14:48

Form details:

COMPLAINT INFORMATION

First Name:

Ryan

Last Name:

Dillon-Capps

Address:

1334 Maple Ave

City/Town:

Essex

State/Province:

MD

ZIP/Postal Code:

21221

Phone Number:

703-303-1113

Email

ryan@mxt3.com

Preferred Title and Pronoun:

X

Are you currently incarcerated?

No

JUDGE INFORMATION

First Name:

Baltimore Country

Last Name:

Circuit Court

Court:

Circuit Court

County/City:

Baltimore Country/ Towson

CASE INFORMATION

Case Name:

Ohana Growth Partners, LLC v Ryan Dillon-Capps

Case Number:

C-03-CV-24-002264

Case Type:

Civil

Date(s) of Hearing (s) or Other Proceeding(s):

June 14 Filed

Case Status:

Pending

The form wouldn't allow for the files to be attached directly.
Filing the Motion to Compel got around this problem.

Relationship to the case:

Defendant/Respondant/Appellee

Were you represented by an attorney?

No

Do you know any witnesses to the judge's alleged sanctionable conduct, impairment, or disability?

No

STATEMENT OF FACTS

Complaint Summary:

The motion to compel is a good starting point. The court record is a good follow up.

I will provide the court until tomorrow to act. Any time after that I will send my certified mail the complaint forms for each Judge.

The upload doesn't seem to be functioning properly. the motion to compel is part of the court record now.

Signature:

A handwritten signature in black ink, consisting of stylized, overlapping loops and curves, resembling the letters 'RDC'.

Date:

2024-10-08



STATE OF MARYLAND
COMMISSION ON JUDICIAL DISABILITIES
P.O. Box 340
Linthicum Heights, MD 21090-0340
410-694-9380
www.mdcourts.gov/cjd

October 11, 2024

Ryan Dillon-Capps
1334 Maple Avenue
Essex, MD 2121

Re: FY25-181 Unk/Dillon-Capps

Dear Mr. Dillon-Capps:

The Maryland Commission on Judicial Disabilities ("Commission") has received your correspondence containing allegations against an unknown judge of the Circuit Court for Baltimore County.

Pursuant to Maryland Rule 18-421(b), the allegations have been considered and found not to constitute a meritorious complaint that should be pursued because they are factually unfounded, or even if proved, fail to establish sanctionable conduct, impairment, or disability on the part of the unknown judge. If you have additional information in support of the allegations, including the identity of the judge in question, please submit it in writing within the next 30 days either by mail to the address above or by email to commJD@mdcourts.gov.

Please note that the Commission does not have the authority to change, modify, or reverse a judge's decision or otherwise intervene in any court proceeding. Investigations conducted by this office are required by law to be confidential. For further information about the Commission, please refer to www.mdcourts.gov/cjd.

Thank you for your cooperation.

Robinson, DeGonia, and Bernstein met the Week of Oct 7 - 11 and the shared language is a direct result.

Sincerely,

Tanya C. Bernstein

Director/Investigative Counsel

TCB/pg

Subject: FY25-181 Unk/Dillon-Capps
From: Ryan Wagner <ryan@mxt3.com>
To: commjd@mdcourts.gov
Date Sent: Sunday, November 10, 2024 2:01:25 AM GMT-05:00
Date Received: Sunday, November 10, 2024 2:01:25 AM GMT-05:00
Attachments: affidavit-factual-basis.pdf,motion-compel.pdf,2024-06-26-transcript.pdf,2024-06-27 Contempt Hearing Transcript Full Page.pdf

Greetings and Salutations to Tanya C Bernstein,

I recently reviewed your letter, and I am deeply concerned by its implications. Due to space restrictions on the form, I was unable to provide complete information in my initial response, which is why I referenced the **Motion to Compel** and relevant court records. That filing was necessary to ensure all pertinent information remained available to the commission.

To summarize the current situation:

1. **Background of the Case:** This lawsuit is based on fabricated claims by both the Plaintiff and their law firm, who acted collectively to evade accountability for prior misconduct.
2. **Key Facts:**
 - In open court, the Plaintiff's counsel admitted to violating my **FMLA** rights and acknowledged that the basis for the injunctive relief was unfounded. After I filed to require their appearance in a hearing to substantiate their claims, they filed for dismissal.
 - Two experts confirm the harm caused by the Plaintiff and law firm, documenting that I am now suffering from **catatonia with malignant symptoms, dissociation, severe memory loss**, and other significant impacts. Supporting evidence—including emails, letters, credit reports—demonstrates a decline from stable financial standing to financial defaults, impacting not only myself but also my disabled brother, elderly mother, and wife with cerebral palsy.
3. **Judicial Misconduct and Procedural Violations:**
 - The judiciary granted a **TRO without notice**, issued a **two-day notice for a show cause hearing** without a preliminary hearing, and dismissed my jurisdictional motions (FMLA, ADA, and FTC Act with multi-state interests, each involving federal protections) without hearing them. My motion for a continuance was denied with after I said "motion for continuance because"
 - **Additional Procedural Violations** include:
 - A **premature default order** (later vacated).
 - A ruling opinion containing inappropriate remarks mocking my disability.
 - Partial and inconsistent rulings on motions, with standards applied so inconsistently that it evidences clear favoritism and bias.
 - Dismissal without prejudice despite pending counterclaims and unresolved motions.
 - Repeated rulings of "MOOT" on active, outstanding issues—strategically used to obstruct legitimate review.
 - **10 or more motions for hearings** have been filed, all denied or not ruled on. Among these, a motion for adjudicated fact remains unaddressed, and a hearing granted while Judge Robinson was on leave was canceled upon his return.

The **Motion to Compel** details a report of systemic judicial violations within the Baltimore County Circuit Court Bench, which have only escalated. Judge Robinson has transitioned from inaction to actively protecting these violations.

Please confirm by **Sunday** that immediate actions are being initiated. I am attaching the documents on record, including recent efforts to address this situation, the referenced Motion to Compel, and two critical transcripts.

As you review, consider the Plaintiff's evasion of accountability, the fabricated claims, and the extensive harm inflicted on me after years of dedicated service to them because they were worried about me filing formal charges, lawsuit, or something related to one or more of the many legal issues I reported on. Their actions culminated in the use of estoppel and breach of accord, with affidavits and expert testimony confirming that injunctive relief was unnecessary.

Had I seen your letter sooner, I would have responded immediately, but at this point, urgent action is required. **Sunday, November 10, 2024** may be your only opportunity to respond. I can only hope you were misled by the **Motion to Compel** that Judge Robinson ruled on, as it remained on the docket far longer than the dismissal order. However, the letter indicates language that mirrors the strategic language being used by the bench and the law firm which unfortunately leads me to believe that improper influence is more likely occurring, and I as much as I dislike viewing actions realistically, instead of optimistically, the risk and harm is too high for me to continue giving participants benefit of the doubt without any evidence to the contrary. I would love to be wrong, and hope swift action later today demonstrates that evidence.

Thank you for your prompt attention to these serious issues. That is not a complete list of violations by the bench.

Sorry to be a rain cloud on your Sunday,
Ryan Dillon-Capps
703-303-1113 (text)
ryan@mxt3.com (email)

Subject: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges
From: Ryan Wagner <ryan@mxt3.com>
To: complaints@agc.maryland.gov
Date Sent: Friday, October 4, 2024 12:02:10 AM GMT-04:00
Date Received: Friday, October 4, 2024 12:02:10 AM GMT-04:00
Attachments: [20241003-C-03-CV-24-002264-complaintform.pdf](#)

That wasn't hyperbole. Attached is a complaint. Case is clear and it's just the start.

It has been 45 days since last ruling --

Ryan Dillon-Capps

ryan@mxt3.com

703-303-1113

prefer text and email - unplanned calls rarely make it past the AI.

Bar Counsel recieved over a thousand pages of exhibits. Every time they were prompted, they confirmed involvement.

ATTORNEY GRIEVANCE COMMISSION OF MARYLAND
ATTORNEY COMPLAINT FORM

Please read the instructions included with this form before filing a complaint.

(1) Your contact information: Mr. ☐ Mrs. ☐ Ms. ☐ Mx. ☐ Doctor ☐ Honorable ☐

Ryan Aurelius Dillon-Capps X
First Middle Last Preferred Pronouns

1334 Maple Ave

Street

Essex Baltimore County MD 21221

City County State Zip Code

ryan@mxt3.com

Email address(es)

703-303-1113

Home phone

Cell phone

Work phone

(2) Attorney against whom you wish to file a complaint:

Miles & Stockbridge

First Middle Last

100 Light Street

Street

Baltimore Baltimore City County MD 21202

City County State Zip Code

Email address(s)

Work phone

Cell phone

(3) Did you hire the attorney? Yes _____ No X

If yes, give the approximate date you employed the attorney: _____ If yes, please enclose a copy of any
retainer agreement with this form.

If yes, state the amount(s) paid to the attorney and the date(s) of payment:

Robert Brennen (rbrennen@milesstockbridge.com)

Steven Frenkil (sfrenkil@milesstockbridge.com)

Holly Butler (hbutler@milesstockbridge.com)

Victoria Klein (vklein@milesstockbridge.com)

Kim Edwards (kjedwards@milesstockbridge.com)

Jessica Duvall (jduvall@MilesStockbridge.com)

* I believe it may be Victoria Klein who needs to be omitted if it is confirmed she has been on
maternity leave for the majority of the case. My memory is Swiss cheese on things, but not
delusional with false memories, I recall there being a female attorney pregnant and on the 17th
before the break I noted the attorneys on record was similar or exactly as the one I remembered as
being pregnant. The additional of Duvall suggests they may have had the baby.

Amount(s) paid: _____

Date(s) paid: _____

**PRIVATE AND CONFIDENTIAL – DO NOT DISSEMINATE
MARYLAND RULE 19-707**

- (4) **If your answer to No. 3 above is “No”, what is your connection with the attorney? Please explain briefly.**

They are opposing counsel by record, co-consirators and co-plaintiff's in

actuality

- (5) **Include with this form (on a separate piece of paper if necessary) a statement of what the attorney did or did not do that is the basis of your complaint. Please state the facts as you understand them. Do not include opinions or arguments. If you employed the attorney, state what you employed the attorney to do. Sign and date each separate piece of paper. Additional information may be requested.**

C-03-CV-24-002264 -- everything siad herein is intentional and known unless

otherwise stated. Miles & Stockbride filed a fraudulent lawsuit designed to aide them both in avoiding judicial review and an attempt to discredit me.

After suffing a mental break moments after first contact with M&S I have been

heavily diminished in my capacity and my pre-existing PTSD that I was on FMLA

leave for when they violated FMLA and ADA to execute their plan. Fortunately,

in the past 3 months I have recovered enough to be about 1/3 back and that was

enough for me to act in a moment of lucidity to provide adequate defense and

explose them and their influence on six Circuit Court Judges that have acted

far beyond Judicial Discretion. Now 45 Days since the last ruling

- (6) **If you have made a complaint about this same matter to any official or agency, state the (their) name(s), and the approximate date you reported it:**

The court record will be a good starting point

We should talk afterwards - urgency and haste. It gets far worse then what I have currently disclosed to the court.

- (7) **If your complaint is related to any case filed in court, please provide the following:**

Baltimore County Circuit Court Ohana Growth Partners, LLC v Ryan Dillon-Capps

Name of Court

Title of Case

C-03-CV-24-002264 June 14, 2024

Case Number

Date Case was Filed

**PRIVATE AND CONFIDENTIAL – DO NOT DISSEMINATE
MARYLAND RULE 19-707**

- (8) **If you are or have been represented by any other attorney with regard to the matter, state the name, address and telephone number of the other attorney:**

Lost my attorney from their lies before they filed on record

- (9) **Do you require translation services?** Yes _____ No X _____

If yes, state the language in which you need translation services: _____

If you require translation services in order to process your complaint, it may delay our communications with you. Is someone available to provide translation assistance for you so that we may communicate with you in English? Yes _____ No X _____

- (10) **Have you read the instructions for filing this complaint and the Frequently Asked Questions?** Yes _____ No X _____ Despite my legal dominance in the past 2 weeks - I am still heavily diminished and getting this done as it is now took a week.

NOTE: Our office now scans all materials, which include complaints and attorneys' responses. We ask that when you submit your complaint, please do not bind, staple, or insert tabbed dividers. If you wish to identify exhibits, please mark them in the bottom corner or insert identifiable sheets before each exhibit. Please do not place sticky notes on the documents you submit. Instead, write your remarks on a sheet of paper placed in front of the page on which you are commenting.

Signature: RDC Date: October 3, 2024

Please mail or email completed Complaint Form and any attachments and enclosures to:

Office of Bar Counsel
Attorney Grievance Commission of Maryland
200 Harry S. Truman Parkway, Suite 300
Annapolis, MD 21401

complaints@agc.maryland.gov

I don't want to sound paranoid, but considering Miles & Stockbridge demonstrating, with ease, the ability to compromise upwards of six Baltimore County Circuit Court Judges - I would feel more comfortable if a neutral party with no prior favorable experiences with the law firm was involved. I reiterate that I am heavily diminished and I don't know if I can properly trust someone with prior favorable engagement and this is entirely a me problem. Chalk it up to PTSD and a weakened state being unnerved.

Subject: RE: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges
From: Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov>
To: "ryan@mxt3.com" <ryan@mxt3.com>
Date Sent: Monday, October 7, 2024 1:01:35 PM GMT-04:00
Date Received: Monday, October 7, 2024 1:01:41 PM GMT-04:00

Thank you for your email. Your correspondence was received and is being processed as a new complaint. Should we need any additional information from you, we will contact you in writing.

Sincerely,

The Office of Bar Counsel

6:12 AM Affidavit of Harm is reviewed by someone outside of the clerks office.
12:50 PM Notice of Hypothesis of Crayon's is Reviewed
1:01 PM The Bar Counsel Responds to the contents of the Notice.



Attorney Grievance Commission of Maryland
200 Harry S. Truman Parkway
Suite 300
Annapolis, MD 21401-7479
Phone: (410) 514-7051
Email: complaints@agc.maryland.gov
Web: www.courts.state.md.us/attygrievance/faqs

Confidentiality Note: This email message and attachments contain information which is confidential and/or legally privileged. The information is intended only for the use of the individual or entity named on this email. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this email information, is strictly prohibited and that the documents should be returned to me immediately. If you have received this email in error or by accidental transmission, please notify me by return email or telephone (410-514-7051); immediately delete all electronic copies of this email and all attachments; and destroy all hard copies. Thank you.

From: Ryan Wagner <ryan@mxt3.com>
Sent: Friday, October 4, 2024 12:02 AM
To: Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov>
Subject: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges

You don't often get email from ryan@mxt3.com. [Learn why this is important](#)

That wasn't hyperbole. Attached is a complaint. Case is clear and it's just the start.

It has been 45 days since last ruling --

Ryan Dillon-Capps

ryan@mxt3.com

703-303-1113

prefer text and email - unplanned calls rarely make it past the AI.

CAUTION : This message originated from **outside of the AGC** email system. Be mindful before clicking on links, attachments, or providing personally identifiable information or financial information. Be especially careful when replying to messages that contain personally identifiable information.

Subject: Re: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges
From: Ryan Wagner <ryan@mxt3.com>
To: Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov>
Date Sent: Wednesday, October 23, 2024 2:01:48 PM GMT-04:00
Date Received: Wednesday, October 23, 2024 2:01:48 PM GMT-04:00
Attachments: reply-opposition-expedited-discovery.pdf,18381686-20241011-1500-ruling-third-admin-hearing.pdf,2024-06-27 Contempt Hearing Transcript Full Page.pdf,2024-06-26-transcript.pdf

Greetings and Salutations,

I was recently informed by Miles & Stockbridge in an unexpected manner that you had reached out to them, and they expressed displeasure in filings unrelated to their client on October 11, 2024. I am attaching other relevant documents for your review, which are not insignificant in length. I assume you have better access to the records than I do.

Attached is the reply in opposition to expedited discovery, which consolidates previous points without adding new information. I never anticipated writing such words, let alone in a court filing, but the truth remains unchanged regardless of my Pro Se status.

I fully understand the distinction between judicial and attorney complaints, but I have long argued that Miles & Stockbridge's influence extends beyond acceptable professional boundaries. I am sharing this not to focus on the court but to highlight the influence being exerted to avoid accountability. Also attached are the June 26th and 27th hearing transcripts, along with a ruling from the administrative judge, issued 12 days ago, for an urgent hearing that remains unresolved.

Miles & Stockbridge's continued involvement, despite prior warnings, should not be overlooked. In my experience, when someone accepts one form of liability, it's because they believe it's the lesser. If I may offer a recommendation—observe from a distance. Should this matter proceed to a hearing, I believe the BAR's presence would provide more insight than any preemptive action. If Miles & Stockbridge withdraws representation, it will signal that the risk exceeds their commitment to Ohana. If they stay, their continued involvement could warrant formal investigation.

This lawsuit is just the beginning of their legal troubles, and I expect future filings to move toward separate criminal and civil proceedings. Please let me know if you need any further information.

Please let me know if you require any additional information.

With thought and purpose,
The 'unbelievable' Dillon-Capps

This was the second prompt to DeGonia to reveal alignment -- this information directly influenced behavior from Robinson, Ensor, Stringer, and Mayer. Pattern matching established controls.

On Mon, Oct 7, 2024 at 1:01 PM Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov> wrote:

Thank you for your email. Your correspondence was received and is being processed as a new complaint. Should we need any additional information from you, we will contact you in writing.

Sincerely,

The Office of Bar Counsel

Subject: Re: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges
From: Ryan Wagner <ryan@mxt3.com>
To: Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov>
Date Sent: Monday, October 28, 2024 10:40:15 AM GMT-04:00
Date Received: Monday, October 28, 2024 10:40:15 AM GMT-04:00
Attachments: amended-affidavit-abusive-use-judicial-system.pdf

They filed to withdraw, I filed what I needed to and there before I moved them into position I already had an urgent hearing that was supposed to be scheduled and an injunctive request.

Page 21 of the attached affidavit is my statement for the **BARs intervention under Expedited Injunctive Hearing 19-732.**

Confirming Alignment

The only action that will not result in further irreparable harm as stated in the affidavit is an expedited hearing and it's been over 2 weeks on the one I already have without a schedule. The Notice of Voluntary Withdrawal gives the **BAR the unique ability under 19-732(g)** to limit or prohibit the withdrawal.

If you need more information then it is yours to have, but if they are allowed to withdraw -- they can not. literal lives are on the line.

RDC

On Wed, Oct 23, 2024 at 2:01 PM Ryan Wagner <ryan@mxt3.com> wrote:

Greetings and Salutations,

I was recently informed by Miles & Stockbridge in an unexpected manner that you had reached out to them, and they expressed displeasure in filings unrelated to their client on October 11, 2024. I am attaching other relevant documents for your review, which are not insignificant in length. I assume you have better access to the records than I do.

Attached is the reply in opposition to expedited discovery, which consolidates previous points without adding new information. I never anticipated writing such words, let alone in a court filing, but the truth remains unchanged regardless of my Pro Se status.

I fully understand the distinction between judicial and attorney complaints, but I have long argued that Miles & Stockbridge's influence extends beyond acceptable professional boundaries. I am sharing this not to focus on the court but to highlight the influence being exerted to avoid accountability. Also attached are the June 26th and 27th hearing transcripts, along with a ruling from the administrative judge, issued 12 days ago, for an urgent hearing that remains unresolved.

Miles & Stockbridge's continued involvement, despite prior warnings, should not be overlooked. In my experience, when someone accepts one form of liability, it's because they believe it's the lesser. If I may offer a recommendation—observe from a distance. Should this matter proceed to a hearing, I believe the BAR's presence would provide more insight than any preemptive action. If Miles & Stockbridge withdraws representation, it will signal that the risk exceeds their commitment to Ohana. If they stay, their continued involvement could warrant formal investigation.

This lawsuit is just the beginning of their legal troubles, and I expect future filings to move toward separate criminal and civil proceedings. Please let me know if you need any further information.

Please let me know if you require any additional information.

With thought and purpose,
The 'unbelievable' Dillon-Capps

Subject: Re: Urgent - Miles & Stockbridge filed fraudulent lawsuit and compromised circuit court judges
From: Ryan Wagner <ryan@mxt3.com>
To: Maryland Attorney Grievance Commission Complaints <complaints@agc.maryland.gov>
Date Sent: Monday, November 4, 2024 6:54:17 PM GMT-05:00
Date Received: Monday, November 4, 2024 6:54:17 PM GMT-05:00

I am reaching out to request a status update on my previously filed complaint concerning multiple attorneys at the law firm of Miles & Stockbridge, PC, and to request corrections in the complaint to reflect the correct individuals:

I. Correct List of Attorneys:

1. Robert Brennen (AIS#8712010068)
2. Steven Frenkil (AIS#7712010110)
3. Holly Butler
4. Victoria Hoffberger (AIS#1912170195)
5. Jessica Duvall (AIS#1812110110)

II. Corrections to Report:

1. Please remove K. Edwards, as they are a Legal Practice Assistant, and do not meet the criteria of this complaint.
2. Remove V. Klein, who was mistakenly listed.
3. Add Victoria Hoffberger, who was unintentionally omitted.

III. Observations and Concerns:

1 This case is based on litigation without a legal or factual foundation, leading to sustained personal and professional harm. The opposing counsel's conduct reflects deliberate engagement in **frivolous, vexatious, and malicious litigation** without regard for the harm caused. Additionally, I have substantial grounds to believe that M&S's conduct, including their leveraging of professional courtesy and reputation, has directly impacted procedural integrity, contributing to rulings that sustain a baseless case and weaponize litigation for harm and abuse of process to evade accountability. They will not succeed on either.

2 This case's broader implications for procedural and ethical accountability require scrutiny of M&S's internal communications and any statements to the Bar. If M&S has provided any misleading or incomplete statements regarding their involvement and knowledge, it is essential that these records come under review. This review would be a critical measure to restore procedural fairness, particularly if intervention and corrective action could prevent further harm. To be clear, the law firm engaged in this lawsuit with their own interest in harming me to protect themselves.

IV. Request for Immediate Action and Records Disclosure:

3 Given the significant procedural and ethical issues here, I request an expedited internal review and disclosure of any records or statements from M&S to the Bar regarding this case. These records may help mitigate harm to others. My counterclaims should help establish a basis because they are aimed at proving **bad-faith litigation, procedural abuse, witness tampering, obstruction of evidence, and ethical misconduct** on the part of M&S. My case involves ongoing and irreparable harm, including an exacerbation of my PTSD and associated health concerns, which has led to critical health threats. This has been sworn in multiple affidavits to the court, establishing the urgency and severity of the situation. Justifying option 2, intervention.

4 In addition to the status update, I request that M&S's communications with the Bar be made accessible for **discovery** purposes. If M&S has presented an incomplete or misleading narrative, it is imperative to rectify this through proper channels. Alternatively, if the Bar finds substantial evidence supporting intervention, I would appreciate immediate action. My intent in requesting these records and intervention is not only to safeguard my interests but also to ensure transparency and accountability within Maryland's legal system and balancing the scales to reduce harm and protect trust in the judiciary.

5 I trust that the gravity of these circumstances and the documented impact will warrant timely action. Given the procedural abuses in this matter, your office's response will signal the appropriate course forward.

Final thought to aid a decision. Read the opposition to the Motion of Sanctions for October 25, 2025, by Miles & Stockbridge. Considering all the things I am affirming and including in other papers, a citation with minimal impact and easily corrected is what they choose to frame a dishonest argument against me. What they don't argue speaks volumes -- time is limited for them, I can not mitigate my actions for much longer. It was hard enough waiting until after the election.

The Nov 4 Email was to Stagger Final Confirmations.

Thank you for your attention and understanding.

OHANA GROWTH PARTNERS, LLC	IN THE
<i>Plaintiff,</i>	CIRCUIT COURT
VS.	FOR
RYAN DILLON-CAPPS	BALTIMORE COUNTY
<i>Defendant.</i>	CASE NO: C-03-CV-24-002264

NOTICE FOR HYPOTHESIS OF CRAYONS

ARGUMENT FOR UNIVERSAL EX PARTE RIGHTS

1 I believe that there may never be another opportunity for any litigant to submit something in **crayon** and have it accepted. Herein, I write in **virtual crayon** to emphasize the **absurdity** and **inappropriateness** of the current situation. In response to the notion that "no one does that," I assert: "Yes, people do. They do it all the time."

2 The issue is not that individuals fail to express their grievances; it is that the first time they step into a courtroom, they are often **bullied into submission**. Whether they enter as a **defendant, plaintiff, petitioner, respondent, witness, or juror**, the statistically relevant factor in determining whether they have a **negative experience** is not their knowledge of the law or the facts of their case, but their **alignment to the proceedings**. Those unfamiliar with the process face an overwhelming disadvantage.

3 In **criminal trials**, defendants are rarely informed of their right to speak at the **grand jury** stage. Before formal charges are even brought against them, a **room of individuals**

has already set forth the presumption of **guilt**. Similarly, in **civil litigation**, the rules should prohibit the actions that allow a case to move forward **unevenly**. Yet, how different is it from the grand jury process, where one party is allowed to present their evidence to the court without the presence or participation of the other party, effectively advancing the case in a **one-sided** manner?

Grand Jury Rights: Under **Federal Rule of Criminal Procedure 6**, **grand jury proceedings** are secret, and while the accused has no right to appear or present evidence, they are often not made aware of their limited rights during this stage. (See **United States v. Williams**, 504 U.S. 36, 1992).

Civil Procedure: Due process in civil litigation is guaranteed by the **Fifth and Fourteenth Amendments**, but procedural imbalances, such as ex parte hearings or motions for summary judgment without proper adversarial input, can undermine

fairness. (See *Mathews v. Eldridge*, 424 U.S. 319, 1976, on the necessity of fair procedures.)

4 What is the **judicial value** of having a mechanism that prohibits a defendant from obtaining **legal representation**? How is this fundamentally different from the **EX Parte** duties of the attorney requesting a **Temporary Restraining Order (TRO)**? If an attorney is expected to present both sides of the issue fairly in an **EX Parte TRO** hearing, why isn't the **prosecutor**, representing the government before a **grand jury**, held to the same standard? The **prosecutor's duty** is to seek justice, not simply to convict, and this includes providing the grand jury with a balanced presentation of the facts.

5 This lawsuit underscores the **necessity** for an attorney, during **EX Parte proceedings**, to present both sides fairly, as part of their **ethical duty**—with no limitations—because once a person is **arrested** or placed under the effect of an **injunctive order**, their reputation and how they are perceived changes instantly. My attorney had already seen evidence, and the case was a **referral** from another attorney with a **conflict of interest**, but that did not prevent the immediate damage caused by the injunction. Whether through an indictment or a **TRO**, once a **grand jury** or **judge** has reviewed the facts and issued an order, the **public perception** becomes one of **guilt**.

EX Parte Proceedings: In **EX Parte** hearings, such as those involving **Temporary Restraining Orders (TROs)**, the attorney requesting the order has a heightened **duty of candor** toward the court. This includes an obligation to disclose both favorable and unfavorable facts (see **Maryland Rule 19-303.3(d)**, which mirrors the **Model Rules of Professional Conduct** on candor in ex parte proceedings).

Prosecutor's Duty to Grand Jury: In **United States v. Williams**, **504 U.S. 36 (1992)**, the **Supreme Court** ruled that a prosecutor does not have to present exculpatory evidence to a grand jury. However, this has been subject to ethical debate, as prosecutors are still bound by professional ethics to seek justice and not simply convictions (see **ABA Standard 3-4.3**).

Public Perception and Injunctions: The issuance of a **TRO** or **indictment** can lead to immediate public damage to a defendant's reputation, as the **Supreme Court** recognized in **Nebraska Press Ass'n v. Stuart**, **427 U.S. 539 (1976)**, where the presumption of guilt created by pretrial publicity and judicial orders can unjustly tarnish an individual's public standing.

PRESUMPTION OF GUILT

6 There was a case in **Washington, D.C.** where an elderly man purchased a car, and not just hours, days, weeks, or months later—over a **year** after the purchase—he was pulled over and arrested. In the car, hidden in a **secret compartment** that was not accessible to the defendant, was **contraband** left behind by the previous owner. The police were actively looking for the previous owner and mistakenly targeted the car, leading to the elderly man's arrest.

7 Despite having **no connection** to the former owner, a **grand jury** indicted the elderly man with no basis for establishing any link between him and the contraband. The

prosecutor was able to convince 11 jurors, and fortunately, the 12th juror was an experienced attorney. That juror presented the case in a way that an overworked public defender had been unable to do, and the jury returned a not guilty verdict the same day. The elderly man came close to losing his liberty for years, solely because of a misunderstanding and an unchecked presumption of guilt.

8 Can you imagine purchasing a used car at an auction, never having met the former owner, and over a year later finding yourself moments away from having your freedom stripped from you because of a mistake? This scenario is no less infuriating than being falsely accused in a lawsuit built on

perjured statements and pursued by a co-conspirator law firm that files to have the defendant incarcerated for failing to comply with conflicting orders—one that mandates action and another that prohibits the same action. It is equally egregious that a law firm would believe they can escape judicial review by withdrawing after they have already used the legal system to further their plot to harm. In criminal law, this is akin to attempting post hoc mitigation, where one tries to undo or lessen the consequences after already having benefitted from wrongful actions.

Presumption of Guilt: In *Taylor v. Kentucky*, 436 U.S. 478 (1978), the Supreme Court ruled that the presumption of innocence is a fundamental principle, and any actions that create a presumption of guilt are a violation of due process. In this

case, the elderly man was nearly convicted solely because of his proximity to the contraband, a situation akin to the violations highlighted in **Taylor**.

Grand Jury Proceedings: The power of a **grand jury** to indict can sometimes create significant unfairness, as recognized in **United States v. Williams, 504 U.S. 36 (1992)**. The lack of obligation to present **exculpatory evidence** can result in defendants being wrongfully indicted without a clear link to the alleged crime.

Conflicting Orders: In cases where defendants face **conflicting legal orders**, the courts have recognized the inherent unfairness, as shown in **United States v. Dixon, 509 U.S. 688 (1993)**. A defendant cannot be expected to comply with contradictory orders, and it is unjust to punish them for failing to do so.

Post hoc mitigation: Refers to efforts made **after the fact** to minimize consequences, often seen in both criminal and civil cases. In **Brady v. United States, 397 U.S. 742 (1970)**, the Supreme Court observed that attempts to **change course after the fact**, such as post-guilty plea behavior, do not erase the underlying harm caused. Similarly, courts have rejected **post hoc mitigation** efforts when they are employed strategically to avoid liability after the wrongdoing has already occurred (see **United States v. Irey, 612 F.3d 1160, 1210-11 (11th Cir. 2010)**).

PRICE OF ADMISSION

9 Once again, highlighting the parallels between the **injustice** I have experienced and the broader systemic failings of the judicial process, where the law acknowledges such actions as **unethical** and outside the bounds of **judicial discretion**. Equally unjust—and lacking any **sufficiency of valid argument**—is the act of **disenfranchising** another innocent person, denying them equality in the judicial process, and leaving them powerless to stop an **indictment** that nearly succeeded in stripping them of their **liberty**. A fate that too often leads to **wrongful convictions** simply because **obtaining an attorney** is prohibitively

expensive, and the process of securing a court-appointed attorney can be a terrifying ordeal.

1 When I was facing incarceration, I had no income, and diverting what little funds I had to an attorney would have meant losing this case outright, with the additional risk of defaulting on my financial obligations. Even now, the risk remains that I could still default. Has anyone taken a close look at the paperwork and considered whether it is reasonable for a pro se litigant to complete it without legal representation? What about someone who is disabled, struggling with memory and cognitive issues? Or that same person suffering from PTSD, facing the reality of a panic

attack at the thought of being charged with a crime simply for asking for help—all while unable to find clear guidance as to whether they even qualify for assistance?

2 Whoever thought it was reasonable to penalize someone for asking for help has clearly never experienced these challenges from the other side. At the time, my memory gaps were still measurable by the number of days since my last memory, and I was expected to recall the specific details of my finances? I argue that if a person has no income, or if the loss of the trial would result in their inability to meet financial obligations—because they are not independently wealthy or

capable of sustaining themselves for years without income—
then they qualify for assistance.

3 The burden of determining eligibility for assistance
should rest with the state, which must provide a written
decision explaining why assistance was granted or denied. We
require lenders to provide written explanations for why an
application for credit is denied; if lenders can justify denying
credit, then surely the state—which seeks to deprive
individuals of their liberty and their ability to sustain
themselves—should bear the responsibility of explaining why
assistance is denied. The state should not rely on fear and
confusion to deter individuals from applying.

HOISTED BY YOUR OWN PETARD

10 Bringing us back to where we started—**first impressions**. A person seeking **public representation** isn't doing so because they have the financial means to hire private counsel. If they did, it would only be **temporary**, and they would be left thinking about what happens when those funds run out. I know exactly what would have happened if I had hired an attorney in this case—I would have **lost**.

11 "**Hoisted by your own petard**," for those unfamiliar with the phrase, refers to a petard—a medieval explosive device used to breach walls. To be **hoisted by your own petard** means to be **blown up by the very device** intended to harm

your enemy. The phrase has since become a metaphor for the unintended negative consequences of one's own actions. In every sense of the phrase, the delays in rulings, designed to deprive me of my voice, ended up backfiring. These very delays allowed me time to recover, and when the default order was finally triggered, it activated another trauma response—a survival mechanism.

12 Normally, I suffer from compulsive empathy when under attack, which makes it nearly impossible for me to assert an aggressive defense. However, when faced with extreme duress—specifically when finality is introduced, such as the threat of a default order—my survival instincts take over. The

inevitable consequence of a final order would have been the end of my career, the collapse of my business prospects, and the catastrophic destruction of my financial base. In that moment, my survival instincts freed me from the paralyzing grip of compulsive empathy that had, until then, prevented me from asserting my rights more directly and forcefully.

13 For those who appreciate irony, it was the very fact that they were hoisted on their own petard—coupled with the absence of an attorney—that allowed me to stop them in the final moments before they succeeded in finalizing the default order. Their delays, averaging over three weeks to rule on my filings, ultimately extended my time to file an answer. This

delay gave me the opportunity to go from experiencing week-long memory gaps to only hours of lost time.

4 Without that improvement, I would have lost context entirely and wasted precious hours looping in confusion, resulting in nothing being filed. That is precisely what happened back in June, when I realized at one point that I couldn't recall what had occurred over the previous nine days. In July, I faced similar periods, with three to six days at a time where I couldn't remember where the documents, I had been working on had gone. This led to duplicated work and overwhelming bouts of depression and hopelessness.

THROWN FROM BED AND SOMEWHERE ELSE

14 I was terrified and felt more helpless in that moment than during any of the atrocities that form the basis of my most traumatic life experiences and PTSD—moments for which I only have partial memories. Yet, I can vividly recall the feelings, the smells, the tastes, and the sounds from those experiences—sensations that are permanently embedded within me. But never before have I felt so deprived of my cognitive abilities as I did when I literally lost something that was in my hand. I would walk into a room holding an object, and then it would disappear, leading me to tear apart the entire room searching for that single object.

15 Then there is the **odd sensation** that happens when your mind "turns back on"—the moment when you suddenly have an awareness of where you are but struggle to **connect** the present to the **context** of what was happening before. The **disconnect** between the two is hard to describe, except that it feels like going to bed in your own home one night, only to wake up in a completely different place and time, as if you've been **thrown from the bed**. Your first thought is the confusion of, "What just happened? Where am I?"

16 A moment later, you realize that **hours, days**, or even over a **week** has passed, and you're not even in the same **clothes** or the same **bed** you fell asleep in. The dream you

were just having fades from memory, leaving you unable to even recall what it was about. In my case, that **little moment** of time—the one sliver of **context** I had to explain anything—was just stripped away.

17 When that **lost time** stretches into **days** or more, my first instinct is to figure out what I've done—or **not done**—in those lost days. On many occasions, I would barely meet a **deadline** because I either had no idea what I had been doing, or I couldn't find what I had been working on. Even when I had something ready to file, I would realize I was working on something else that I couldn't remember and, once again, I couldn't find the document I needed.

18 My walls are covered in dry-erase boards, papers pinned in places that are not occupied, and a calendar to help me track deadlines. In those moments of lucidity, I would focus all my energy on filing the next important item on the list, knowing that my ability to act was always limited by the next memory lapse.

UNAFFORDABLE AND UNACCEPTABLE

19 Do you know what fear and feelings of hopelessness do to a person? The Bureau of Justice Statistics reports that the suicide rate in local jails is five times higher than in the general population, with many of these incidents occurring shortly after detention—often within the first 24 hours. For

those with **disabilities** or **mental health challenges**, the rates are even higher during or after legal proceedings, reflecting how vulnerable individuals can be in these high-stress situations.

20 The **average resident** of the county will likely never read this, but I wrote this in "crayon" in the hope that it will stand out enough for **legal professionals** to pick it up and read it. I am in a unique position where I can place this on the **court record**, and it is nearly impossible for anyone to stop it from being added. It directly relates to my case, and the parallels drawn between these statistics and my personal situation are legitimate arguments. Under **Maryland Rule 1-202(a)**, which emphasizes that procedures should not unduly

burden a party, I argue that my use of "crayon" and informal formats, such as these section headers, should not be considered an obstacle. The rule prohibits unnecessary formalities that restrict access to **due process**, and my presentation is a direct reflection of the **mental and emotional toll** these proceedings have had on me.

Turner v. Rogers, 564 U.S. 431 (2011): The Supreme Court in **Turner v. Rogers** emphasized the importance of ensuring that individuals, especially those facing detention, are provided with adequate procedural protections. The Court recognized the vulnerability of individuals without representation and the potential for **due process violations** when formalities and legal processes are not made accessible to them.

Zinerman v. Burch, 494 U.S. 113 (1990): In **Zinerman v. Burch**, the Court highlighted the risks of **procedural inadequacies** for individuals with **mental health challenges**. The case emphasized that when individuals are not given proper procedural

safeguards, particularly in contexts that involve mental health or vulnerability, it can lead to severe **due process violations**.

PREDICTABILITY AND HAPPENSTANCE

21 **Intelligence** and **counterintelligence** work may not be as thrilling as many imagine. Most of the tasks are rooted in **nuance**—in the details that are often overlooked by everyone else. However, for someone sufficiently attuned to those minor moments and decisions, these overlooked details can tell a much larger story, revealing truths that parties may prefer to keep hidden. Take, for example, this case: imagine for a moment that this were not a **fraudulent lawsuit**—what would that look like? Now, walk through the timeline of this case, and a **pattern** of behavior emerges—one of **cause and effect**. The

Defendant raises a claim about PCI Compliance, and suddenly an expert is hired. The Defendant points out that Hartman Executive Advisors (HEA) was not involved, and HEA produces an affidavit contradicting that. At face value, these seem like normal legal responses, but upon closer inspection, the behavior tells a more deliberate story.

22 The famous counterintelligence case of Günter Guillaume, an East German spy, comes to mind. His exposure came from something as subtle as how he held a flower upside down. In this case, we have a similar detail: the first expert affidavit submitted by Miles & Stockbridge was unsigned, a critical error. In their haste to evade scrutiny, they had to

circumvent the rules and later attach the signature—a minor but telling misstep. This carelessness reveals that **Randall Romes' Affidavit** I was, in essence, being held **upside down**. Knowing how the law firm reacts—hastily and defensively—presents an opportunity to lay a trap where any action they take would be a **loss**.

23 The circumstances of **HEA's departure** and involvement provide a strong foundation for creating such an opportunity. The carelessness observed in **Holly Butler's** inflammatory responses, the hastily filed lawsuit, and the missing signatures are all part of a **pattern**. For those unfamiliar with the art of **intelligence**, follow-up actions must

be laid out meticulously. In **Günter Guillaume's** case, a familiar person would appear on his regular route, gradually getting closer and closer until it seemed perfectly natural that they would exchange pleasantries side by side—an orchestrated moment that would expose him.

24 While I may be **mentally diminished** due to the circumstances of this case, that does not mean I am without **awareness**. I can still use this to my advantage, much like how **counterintelligence** efforts used **Günter Guillaume's** predictable route. **Same route, same predictable behavior**—and that same predictability gives me the opportunity to allow **Miles &**

Stockbridge to do what they always do: repeat their carelessness, ultimately to their own detriment.

THE UNBELIEVABLE IS IGNORED

25 This is why I would have lost if I had hired a lawyer—because I could barely get anyone to believe I had a case, let alone that I wasn't a liar. To then tell them that there was foul play and collusion, and that a law firm founded in 1932 was engaging in such acts, would have been deemed unbelievable. Coming from someone who, on some days, couldn't even remember a conversation, where they had placed a file, or the status of the case, my claims would have been ignored. Every effort would have repeated the mistakes I made with

Ohana: thinking that others would believe the merits of my case based on **evidence** alone.

26 Specifically, I held onto the belief that my efforts—backed by evidence—would be **sufficient** if they were just reviewed by someone who wasn't **biased** or the wrong messenger. But that's not how things played out. The actions of **Miles & Stockbridge** tell a story in what is **unsaid**.

27 Within the **court's silence** is another story. After I pointed out the delays in my filings being entered into the system, there was an **overcorrection**. Now, when I submit something, it's **grabbed immediately**, suggesting that my filings are no longer being ignored. So, to that, I send a warm

greeting to those additional eyes now reviewing my submissions.

GREETINGS AND SALUTATIONS

28 U.S. District Judge George L. Russell III denied former Baltimore police officer Daniel Hersl's request for compassionate release in November 2023. Hersl, convicted of racketeering and robbery as part of the Gun Trace Task Force scandal, argued for release due to his terminal cancer diagnosis. However, Judge Russell emphasized the seriousness of Hersl's crimes, stating that his actions "irreparably damaged" public trust, and concluded, "a message certainly needs to be sent

that if you commit criminal conduct or otherwise engage in a racketeering conspiracy, you will be held accountable"

29 It has now been 46 days since my filings have gone unanswered by the entire Circuit Court, and this continued lack of response is deeply concerning. The dereliction of duty appears to be more than mere oversight; I am led to conclude that this is a case of intentional negligence. While I lack sufficient information to determine whether this is due to outside intervention or a coverup within the court system, the pattern is clear.

30 I remind the court that on June 26, 2024, my words to Judge Barranco were:

"—erm, on both days I was forced to work. Erm, on the 13th, I submitted a **cease and desist**, saying they're encroaching on my **FMLA**, please let me have my **FMLA time**. Erm—" This statement speaks directly to the **coercive tactics** used to compel me to work while denying me my rights under **FMLA**, a clear violation of federal law.

31 What do you call it when someone seeks to deprive another of their **liberty** and forces them to work without pay? In history, that was called **slavery**. Today, we call it **human trafficking**. Under Md. Criminal Law Code Ann. § 3-1105—Civil Remedy for **Human Trafficking**—I am hereby adding this claim to my request for relief. Further, I am requesting that the

following individuals be added to my claim as co-conspirators:

Marc A. DeSimone Jr., Keith R. Truffer, Michael Barranco, Jan Marshall Alexander, H. Patrick Stringer, Stacey A. Mayer, Andrew Batista, Holly Butler, Steven Frenkil, Robert Brennen, Jessica Duvall, Kim Edwards, Glenn Norris, Victor Brick, Richard Hartman, Justin Drummond, Ryan Brooks, Daniel Levett, and Randall Romes. These individuals have all played direct roles in the events leading to this litigation.

32 A Motion to Join Indispensable Parties will be filed by Monday at midnight, along with a new proposed order consolidating all requests. We will withdraw the previous proposed order and soon after -- file our answer, which will

include a **counterclaim** against the individuals listed. This counterclaim will seek relief for issues not addressed in the current lawsuit and will expand the timeline to cover the events leading up to June 13, 2024, including the Plaintiff's violations. Additionally, we will file to **depone Karen Cepress, Alyson Ratliff, Darren Koritzka, Ann Pinera, Kali Roscoe, Shannon Anderson, and Dante Martinez**. We will also request **discovery** of all the Plaintiff's personal and work phone **text records** from their respective carriers—not from the individuals themselves.

33 The omission of **Lynne Brick and Victoria Klein** is intentional. **Lynne Brick** is omitted in consideration of her

parental duties, and we will accommodate a remote deposition for Victor Brick. As for Victoria Klein, she is omitted pending confirmation of her status as a new mother and her lack of involvement in this case. Upon confirmation via affidavit, I will support her withdrawal as attorney of record and wish her the best in her personal and professional life.

34 In addition, Karen Debus, Kristen Seiler, and Leann Hartman will be added to the counterclaim. This filing also includes notice that we will be requesting depositions from every Plaintiff involved in this case, to testify on matters directly related to the events leading up to June 13, 2024, and beyond. The counterclaim will focus on this same timeframe,

May 20, 2024, through the events discussed in the original suit. I will be monitoring the progress of these filings for evidence to shift me to decide if it is necessary to begin contacting and distributing the court records to the appropriate channels to ensure the remainder of this and future proceedings is handled appropriately. Before Justin Drummond breached the contract to pursue this fraudulent lawsuit, I told him that he didn't need to agree with me, but he needed to be able to justify his decision and that is all I was ever asking for.

DECLARATION OF AFFIRMATION

I SOLEMNLY DECLARE AND AFFIRM UNDER PENAL TIES OF PERJURY AND UPON PERSONAL KNOWLEDGE THAT THE CONTENTS OF THE FOREGOING PAPER THERETO ARE TRUE.

October 5, 2024

s/ Ryan Dillon-Capps
Ryan Dillon-Capps (Pro Se)
Email: ryan@mxt3.com
1334 Maple Avenue
Essex, Maryland 21221
Telephone: (703) 303-1113

RESPECTFULLY SUBMITTED

October 5, 2024

/s/ Ryan Dillon-Capps

Ryan Dillon-Capps (Pro Se)
Email : ryan@mxt3.com
1334 Maple Avenue
Essex, Maryland 21221
Telephone: (703) 303-1113

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 5, 2024, a copy of Notice for Hypothesis of Crayons via email to rbrennen@milesstockbridge.com and served on via first-class mail, postage prepaid on:

Robert S. Brennen
Miles & Stockbridge P.C.
100 Light Street
Baltimore, Maryland 21202

/s/Ryan Dillon-Capps
Ryan Dillon-Capps (Pro Se)

IN CHAMBERS WITH THE HON. JUDITH C. ENSOR: LIVING IN THE MOMENT

By Matt M. Pacvola



Any lawyer who has ever appeared before Judge Judith C Ensor will have a distinct recollection of the experience. She processes the facts and the law at breakneck speed. The casual litigant is constantly trying to keep up with her. I suggested to Her Honor that some might perceive it as impatience, as she peppers oral argument with her quick summations and observations. Not so, reacted the Judge. Her mannerisms are dictated by her thorough preparation and her awareness that time is money and money is time. She knows someone is paying for the lawyers and she wants to be sensitive to the clients picking up those tabs. Best practices call for the trial judge to be fully prepared and to get to the point of decision-making quickly and efficiently. She deflected any notion about her brilliance, and attributed her courtroom demeanor to extensive preparation and awareness of the present moment. Upon reflection, that made good sense to me. I was able to look back on to some of my own experiences and realize that Judge Ensor lives in the moment, but wants to keep the pace moving out of consideration for the parties. Still, it is a good thing I brought my recorder to the interview because, yet again, I found myself tagging along!

Unsurprisingly Judith C Ensor was an excellent student. She was born on a farm in Baltimore County and found her way to undergraduate school at St Lawrence University in Canton, New York where she excelled. She had no problem being admitted to

what in 1988 was known as the University of Maryland School of Law. There she served on law review, graduated magna cum laude and addressed her class at the graduation ceremony. Judge Frederic Smalkin, of the federal bench, known for his intellectual prowess, recognized talent when he saw it and snagged her right out of law school. After one year she made her way to clerking in New Hampshire. Yes, you read that correctly. Why there? Aware of her fading opportunity to live in the moment with her grandparents who resided there, she was able to use her ample credentials to get hired by the highest court in that state where, coincidentally, she had the opportunity to brush elbows with Judge David Souter before he was appointed to the Supreme Court and concomitantly fulfill that desire to spend quality time with her grandparents.

From there she landed at Whiteford Taylor and Preston in 1990. Given the choice of their locations, she chose Towson because there would be greater opportunity to hone her litigation skills. That she did under the 15 year tutelage of Mr. William Whiteford himself.

After the 2000 acrimonious Gore-Bush election debacle, Judge Ensor was so “struck” by the orderly transition of presidential power, once boxing gloves were lowered, that she was inspired to become “part of the solution” to help advance the democratic process; she put her name in for the bench. As customary for this rising star, she sped through the nomination process, made the short list, and got the nod from then Governor Robert Ehrlich. She was sworn in on November 28, 2005 and has lived in the moment ever since.

Judge Ensor considers it a highest priority that parties and jurors in her courtroom enjoy a positive experience. She wants them to sense that she is all in, giving that dispute on that day her undivided attention. The goal is for litigants to have confidence in the judicial process, win or lose. The Judge likes to pronounce her rulings in plain English to facilitate

IN CHAMBERS WITH THE HON. JUDITH C. ENSOR: LIVING IN THE MOMENT

By Matt M. Paavola

transparency. No arcane legalese for this trial judge. That would defeat the “mindfulness” she seeks to foster.

What was her most difficult trial emotionally? Without hesitation Her Honor recalled the day she pronounced a criminal defendant “Not Guilty” to the charge of gross negligence in a trial involving the tragic death of a young child, Jake, at a Christmastime motor vehicle accident. The trial went painfully slow. At closing, after pausing to reflect and ponder the moment, Judge Ensor had to choke back tears as she summonsed the fortitude plainly and clearly to explain to the victims, Jake’s mom and dad, the reasoning behind her findings, quickly adjourning before the courtroom could perceive her emotions. Indeed, in most criminal trials Judge Ensor likes to recess and reflect on the criminal jury pattern instruction on “beyond a reasonable doubt”. It centers her—like I said, living in the moment.

Days before the interview I sent Judge Ensor 12 possible talking points, ranging from the mundane (Cicadas and “Friends” sitcom) to the sublime (life after death). She chose the following three:

A French Secular Proverb Declares: “You Not Only Have To Want What You Want, But You Also Have To Want What Your Wants Lead to”. Do You Agree or Disagree?

“I agree. I guess if you just want what you want, and you stop at that, because you haven’t read the rest of the book, that’s not the end. For example, let’s say I want to be a judge. Well that leads to tough decisions. You will have to try family law cases involving tough child custody battles for example. That’s one third of the workload. Don’t take a train to Chicago if you don’t want to get out at Chicago!

I had to think this through before I became a judge. And I believe I did. The good part was I had the fantastic opportunity to stay in law where I had expertise as a litigator,[minus the family law and criminal law experience]. You have to look ahead and realize that as a judge you will not have personal

scheduling flexibility as you might as a private practitioner.

On trials involving egregious behavior of the defendant, the proverb does not necessarily apply. I am unclear as to whether a child abuser, for example, understands that wanting to birth a child might lead to such a dark decision as abuse. But the proverb applies to a drug dealer who probably figures that what he wants might lead to outcomes [like arrest] that he does not want.”

As you know, Jesus of Nazareth made profound and even contentious claims to being the Lord and Son of God. Cambridge novelist CS Lewis declared that such a claim is amenable to only three interpretations: he was either a liar, a lunatic, or Lord. Do you agree or disagree?

“I disagree because I think there are more shades of grey. If Jesus is saying I am Lord, and believes it, but it is not true, is he a liar? Not necessarily. I do not think Jesus was mentally ill, but the only way one can know for sure[whether He is Lord of all] is when you die. He might be Lord, but he might be something else, like a prophet. If Jesus [ends up being] wrong, I don’t think he is necessarily a liar.

Every once in a while we run into people who publicly make profound claims about themselves, even here in Towson. And I think to myself that he could be telling the truth. Even as to the Second Coming[of Jesus], are people going to be accepting of that? People tend to think claims of this ilk are to be dismissed as crazy. I hope we don’t miss the event [that was announced]. I think people have to have freedom to believe what they want. “

Assuming There Is an Afterlife, What Will Be Your Most Pressing Query?

“I will want to know if I made a positive difference on this side of life. And then I will want to check in on some of my friends. I choose to see it as a positive to see people who have passed away, and [even] watch out for people who are still here [on

IN CHAMBERS WITH THE HON. JUDITH C. ENSOR: LIVING IN THE MOMENT

By Matt M. Paavola

Earth]. (At this point the Judge shared a profound but personal supernatural experience involving family and asked that the details not be published).

[But I can share] the event of my father's funeral on our old family farm. On the day we held his [processional] on the farm, the livestock [without prompting] made their way from the usual back of the farm to the front of the farm in an orderly line, and then watched, as if to pay homage to the passing away and funeral gathering of their [beloved caretaker]. It is not my way to tell people that this was a miracle, or even telling others about God's will, but . . . [generally] I do not spend a lot of time on things that are unanswerable. I do not spend a lot of time wondering about possibilities. I prefer to live in the moment."

RICE | MURTHA | PSORAS
TRIAL LAWYERS

Super Lawyers

PERSONAL INJURY
WRONGFUL DEATH
MEDICAL MALPRACTICE
CRIMINAL DEFENSE
FAMILY LAW
WILLS & ESTATES

INFO@RICELAWMD.COM
RICELAWMD.COM
410.583.6969
1301 York Road, Suite 200, Lutherville

PRO BONO DAY

By Tommy Tompsett

The term "pro bono" comes from the Latin pro bono publico, which means "for the public good." The American Bar Association's Standing Committee on Pro Bono and Public Service best framed an attorney's inherent obligation to strive to perform such good when it noted, "When society confers the privilege to practice law on an individual, he or she accepts the responsibility to promote justice and to make justice equally accessible to all people. Thus, all lawyers should aspire to render some legal services without fee or expectation of fee for the good of the public."

On Saturday, June 12th, six attorney volunteers on behalf of the Pro Bono Committee of the Baltimore County Bar Association (BCBA), in conjunction with Maryland Legal Aid (MLA), hosted a Pro Bono Day at the North Point Public Library in Dundalk. After navigating a line that stretched out the library entrance and across the front of the building, those seeking free legal civil aid talked one-on-one with a lawyer.

During the four-hour event, the BCBA and MLA assisted 57 clients on 69 legal issues, including bankruptcy, trust & estates, consumer protection, family law, expungements, landlord-tenant, and landlord-tenant and public benefits.

The event was quite successful. So successful, in fact, that the BCBA Pro Bono Committee will be joining once again with MLA to host a similar event in early October, taking their goodwill to the west side of Baltimore County this time. Should you like to participate in the fall event, please reach out to Aaron Parker, Chair of the Pro Bono Committee, at aparker@lawpga.com

